

Missouri Department of Natural Resources Air Pollution Control Program 2020 Monitoring Network Plan

September 25, 2020

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Summary of Recent and Proposed Changes

The Missouri Department of Natural Resources operates an extensive network of ambient air monitors. Missouri's Monitoring Network Plan summarizes the network and discusses recent and proposed changes. The changes are summarized below.

- 1. Effective Jan. 1, 2020, Doe Run made the following changes in its Herculaneum monitoring network: sampling frequency at North Cross was reduced to every third day, collocated monitoring at Church Street was discontinued and monitoring at Sherman was discontinued. These changes do not require Department or EPA approval since these monitors are not required in 40 CFR 58 or in any formal agreements. The Department informed EPA Region 7 of these changes on Sept. 30, 2019.
- 2. Doe Run monitoring activities are currently designated as three separate primary quality assurance organizations (PQAO): Doe Run Buick, 1288; Doe Run Glover, 1289; and Doe Run Herculaneum, 1290. The Department proposes to combine these into a single PQAO (1290) effective Jan. 1, 2021. The three Doe Run networks are all using the same analytical laboratory for lead analysis and the same contractor for assistance in developing Quality Assurance Project Plans (QAPPs) and providing Quality Assurance (QA) audits.
- 3. The Department has begun the process of obtaining retrofits of the 1405-DF instruments at PM_{2.5} monitoring sites to 1405-Fs. As of June 2020, the Department is operating 1405-F instruments at six sites. We plan to convert two additional sites (St. Joseph; two monitors and Richards Gebaur South) to 1405-F operation in 2021, subject to the availability of funds.
- 4. The West Alton ozone monitoring site was inoperative from May 2 to 16 and May 22 to July 16, 2019, because it was removed to avoid damage due to flooding. Because of its importance as the design value site for the St. Louis area, the Department is developing a cost estimate and plan for elevation of the West Alton monitoring site above the 2019 high water level to minimize outages related to flooding in the future. Any changes will still meet probe height requirements.
- 5. A Photochemical Assessment Monitoring Station (PAMS) Implementation Plan, updated from the versions included in the 2018 and 2019 Monitoring Network Plans, is included as Section 9 of this plan. PAMS monitoring is planned to begin at the Blair Street site on June 1, 2021.

How to Make Public Comments Concerning this Plan

The Department of Natural Resources posted the 2020 Monitoring Network Plan (Revision 0) on the web for public review and comment on July 15, 2020. The Department accepted comments concerning the plan electronically at cleanair@dnr.mo.gov, or by mail to the following address:

Missouri Department of Natural Resources Air Pollution Control Program Air Quality Analysis Section/Air Monitoring Unit P.O. Box 176 Jefferson City MO 65102

The Department has included all comments received through August 14, 2020 and responses to comments in Appendix 2 of this final version of the plan. Minor corrections to the plan are also identified in Appendix 2.

Introduction

The Missouri Department of Natural Resources operates an extensive network of ambient air monitors to comply with the Clean Air Act and its amendments. The Ambient Air Quality Monitoring Network for Missouri includes State and Local Air Monitoring Stations (SLAMS), Special Purpose Monitors (SPM) and a National Core (NCore) monitoring site consistent with requirements in federal regulation in Title 40, Code of Federal Regulations, Part 58 (40 CFR 58).

40 CFR 58.10 requires states to submit an annual monitoring network plan including any proposed network changes to EPA. 40 CFR 58.10 requires the plan to include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D and E of 40 CFR 58 where applicable. All of the monitors in the Missouri air monitoring network, including those operated by the State and those operated by industries under state review meet the applicable requirements of 40 CFR 58. Any changes to the SLAMS requires approval by the EPA Regional Administrator.

The plan must contain the following information for each monitoring station in the network; (See Appendix 1 and the body of this document):

- 1. The Air Quality System (AQS) site identification number for existing stations.
- 2. The location, including the street address and geographical coordinates, for each monitoring station.
- 3. The sampling and analysis method used for each measured parameter.
- 4. The operating schedule for each monitor.
- 5. Any proposal to remove or move a monitoring station within a period of 18 months following the plan submittal.
- 6. The monitoring objective and spatial scale of representativeness for each monitor.
- 7. The identification of any sites that are or are not suitable for comparison against the annual PM_{2.5} National Ambient Air Quality Standard (NAAQS).

8. The metropolitan statistical area, core-based statistical area, combined statistical area or other area represented by the monitor.

A network assessment is required every five years, and the most recent one was completed in June 2020.

Network Design

Federal regulation (40 CFR Part 58) establishes the design criteria for the ambient air monitoring network. The network is designed to meet three general objectives:

- 1. Provide air pollution data to the public in a timely manner.
- 2. Support compliance with ambient air quality standards and emissions strategy development.
- 3. Support air pollution research studies.

Specific objectives for the monitoring sites are:

- 1. To determine the highest pollution concentrations in an area.
- 2. Measure typical concentrations in areas of high population density.
- 3. Determine the impact of significant sources or source categories.
- 4. Determine general background levels.
- 5. Determine the extent of regional pollutant transport among populated areas.

Minimum site requirements, based on Core Based Statistical Area (CBSA) population, are provided for ozone (O₃), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen dioxide (NO₂), airborne particulate matter with aerodynamic diameter equal to or smaller than 10 micrometers (PM₁₀), and airborne particulate matter with aerodynamic diameter equal to or smaller than 2.5 micrometers (PM_{2.5}).

40 CFR 58 Appendix E establishes the specific requirements for monitor/probe siting to ensure the ambient data represents the stated objectives and spatial scale. The requirements are pollutant/scale specific. Periodically, Department staff visit and evaluate each monitoring site to ensure compliance with the requirements of 40 CFR 58 Appendix E. Additional details concerning the sites are available in Appendix 1.

Unanticipated Network Modifications

Changes to the monitoring network may occur outside the annual monitoring network planning process due to unforeseen circumstances including, but not limited to, severe weather, natural events, changes in property ownership, changes in federal funding, or changes in funding available from air emission fees from industrial facilities. The Department will communicate any changes to the network that result from conditions outside the state's logistical control and not included in the current monitoring network plan to EPA Region 7 staff and identify such changes in the subsequent annual monitoring network plan.

Special Purpose Monitors

A monitor is designated as a special purpose monitor (SPM) consistent with the regulatory definition in 40 CFR 58.20 (a): "An SPM is defined as any monitor included in an agency's monitoring network that the agency has designated as a special purpose monitor in its annual monitoring network plan and in AQS, and which the agency does not count when showing compliance with the minimum requirements of this subpart for the number and siting of monitors of various types."

SPMs may be established for many different purposes, including but not limited to NAAQS compliance evaluation, air quality research and characterization, air quality investigation and monitoring method evaluation.

The Department includes SPMs in the annual monitoring network plan required by 40 CFR 58.10. The Department installs or approves the installation of these monitors consistent with 40 CFR 58.20 (f). In addition, the Department removes, or allows removal of these monitors, following federal guidelines, which are different for SPMs than for SLAMS. There is more description of each SPM later in the document. The Missouri Monitoring Network Description, Appendix 1, identifies which monitors are SPM and which are SLAMS.

Industrial Monitors

Ambient air monitoring sites classified as Industrial in this plan indicate the ambient air monitoring at that site is being conducted by the industrial source or its contractor under an approved industrial monitoring Quality Assurance Project Plan (QAPP) and departmental Quality Management Plan (QMP). Department staff conducts quality assurance audits of these monitoring sites consistent with the approved QAPP.

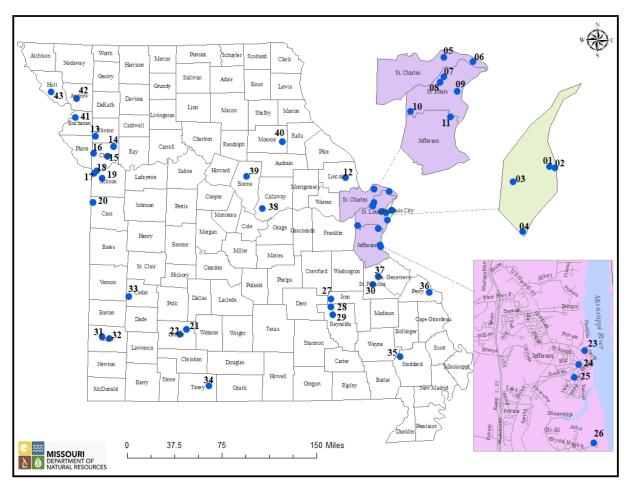
Missouri oversees ambient air monitoring sites operated by industrial sources for NAAQS compliance. The Department has incorporated these Industrial sites in the annual Monitoring Network Plans. Currently, some industrial monitoring sites for lead and SO₂ are incorporated in the ambient air monitoring network.

Some industrial lead monitoring sites are classified in AQS as non-regulatory due to the sites transitioning to non-ambient status. However, the Department has required continued monitoring at these locations in agreements with the industrial source for trends analysis or other purposes.

2020 Ambient Air Monitoring Network, State Sites

The 2020 statewide monitoring network is shown in the following map and table.

2020 Missouri State Monitoring Network



		Monitoring Network)				_	
	uis Area			field Area		<u>Acronyms</u>	
Site#	Site Name	Parameter Monitored	Site# 21	Site Name Fellows	Parameter Monitored O3. IT	PM ₁₀	Particulate Matter (Diameter size <10 micrometer
01	Blair Street^	PM ₁₀ , PM ₂₅ , PM ₂₅ (Spec),	21	Lake	O3, 11	PM ₂₅	Particulate Matter (Diameter
-	Dian Street	PMCoarse, PM ₁₀ -LC,	22	Hillcrest	O ₃ , PM ₁₀ , PM ₂₅ , PM ₁₀ -LC,	1 10125	size ≤2.5 micrometer)
		PM ₁₀ -Pb, O ₃ , SO ₂ , NO ₂ ,		High School	OT, IT, BP, RH	PMCoarse	Particulate Matter (Diameter
		NO _v , NO _x , NO, CO,		mgn dender	01, 11, 01, 111	rivicoarse	size between 2.5 and 10
		Carbonyls, PAHs, VOCs,					micrometer)
		Air Toxics, Carbons, PM ₁₀		<u>laneum Area</u>		Spec	Speciation
		Metals, WS, WD, OT, IT,	Site#	Site Name	Parameter Monitored	SO ₂	Sulfur Dioxide
		SR, BP, RH, PAMS	23	Sherman	Pb	NO ₂	Nitrogen Dioxide
02	Branch	PM ₁₀ , PM ₂₅ , WS, WD,	24	Dunklin	Pb	NO	Nitric Oxide
	Street	OT, IT, BP, RH		High School		NOy	Reactive Oxides of Nitrogen
03	Forest Park	PM _{2.5} , PMCoarse, PM ₁₀ -	25	Mott Street	Pb, SO ₂	NOx	Oxides of Nitrogen
		LC , NO ₂ , NO _x , NO, CO,	26	Ursuline	Pb	Оз	Ozone
		BC, WS, WD, OT, IT, SR,		North		со	Carbon Monoxide
		BP, RH, Prec				Pb	Lead (High Volume)
04	South	PM ₁₀ , PM ₂₅ , IT, BP, RH		<u>ead Belt Area.</u>		BC	Black Carbon
	Broadway		Site#	Site Name	Parameter Monitored	Prec	Precipitation
05	Orchard	O ₃ , IT	27	Buick NE	Pb, SO ₂ , WS, WD, IT	WS	Resultant Wind Speed
	Farm		28	Oates	Pb 	WD	Resultant Wind Direction
06	West Alton	O ₃ , WS, WD, OT, IT, SR	29	Fletcher	Pb	OT	Outside Temperature
07	Rider Trail	NO2, NOx, NO, WS, WD,	30	St. Joe	Pb	IT	Inside Temperature
	I-70	OT, IT, SR, Prec, BP		State Park		SR	Solar Radiation
		SO ₂ (RES)				BP	Barometric Pressure
80	Maryland	О₃, ІТ				RH	Relative Humidity
	Heights			ate Area		IMPROVE	Interagency Monitoring of
09	Ladue	PM _{2.5} , OT, IT, BP, RH	Site#	Site Name	Parameter Monitored		Protected Visual Environment
10	Pacific	O ₃ , IT	31	Alba	O ₃ , IT	B.E.C.	(Regional Haze)
11	Arnold West	PM ₁₀ , PM ₂₅ , PM ₂₅ (Spec),	32 33	Carthage El Dorado	PM ₁₀ , WS, WD, IT	RES	Research
		IT, O₃, WS, WD OT, IT, BP, RH	22	Springs	PM _{2.5} , O ₃ , WS, WD, OT, IT, BP, RH	DAME	Dhatashaada Aasaaa
12	Foley West*	ог, кп Оз, IT	34	Springs Hercules	PM _{2.5} (Spec)-IMPROVE	PAMS	Photochemical Assessment Monitoring Station
12	roley west	03,11	34	Glades	FIVIZS (Spec)-IIVIFROVE		Monitoring Station
Kansa	s City Area		35	Mingo	PM _{2.5} (Spec)-IMPROVE		
Site#	Site Name	Parameter Monitored	36	Farrar	O ₃ , IT		
13	Trimble	O ₃ , IT	37	Bonne	O ₃ , IT, SR		
14	Watkins Mill	O ₃ , IT		Terre			
15	Liberty	PM _{2.5} , PM ₁₀ -LC, O ₃ , OT,	38	New	O ₃ , IT		
-	,	IT, SR, BP, RH		Bloomfield	•		
16	Rocky Creek	O ₃ , IT	39	Finger	O ₃ , IT		
17	Troost	PM ₂₅ , SO ₂ , NO ₂ , NO _x ,		Lakes			
		от, іт	40	Mark	PM ₁₀ , SO ₂ , NO ₂ , NO _x , NO,		
18	Front Street	PM ₁₀		Twain State	O ₃ , WS, WD, IT		
19	Blue Ridge	PM ₂₅ , PMCoarse, PM ₁₀ -		Park			
	I-70	LC, NO ₂ ,	41	St. Joseph	PM ₁₀ , PM ₂₅ , PM ₁₀ -LC, WS,		
		NOx, NO, CO, BC, WS,		Pump	WD, OT, IT, RH		
		WD, OT, IT, SR, BP, RH,		Station			
		Prec	42	Savannah	O ₃ , IT		
20	Richards	PM _{2.5} , PM ₁₀ -LC, O ₃ , WS,	43	Forest City,	Pb		
	Gebaur-	WD, OT, IT, BP, RH		Exide			
	South						
			*Reloc	ated from forme	er Foley site		

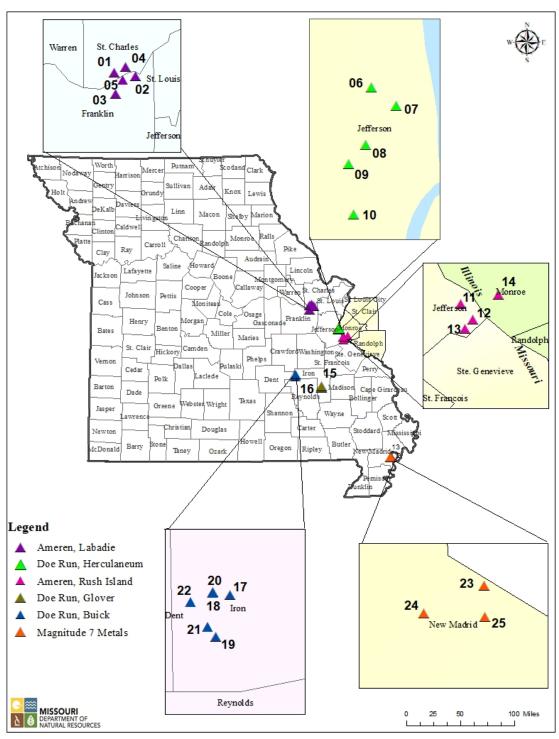
Notes:

- 1. The acronym PM_{10-LC} is also commonly referred to as PM_{10c} when collected with a low volume sampler consistent with appendix O to Part 50. PM_{10-LC} means particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers where the concentration is reported at local conditions of ambient temperature and barometric pressure. PM_{10-LC} is used in this document to describe any continuous or filter based PM₁₀ low volume measurement concentration that is reported at local conditions of ambient temperature and barometric pressure.
- 2. PM₁₀ means particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers where the concentration is adjusted to EPA reference conditions of ambient temperature and barometric pressure (25 °C and 760 millimeters of mercury or STP).
- 3. PMCoarse is also frequently referred to as $PM_{10-2.5}$.

2020 Ambient Air Monitoring Network, Industrial Sites

Monitoring sites operated by industries are shown in the following map and listed in the following table.

2020 Missouri Industry Monitoring Networks



Legend (Industry Monitoring Network)

Ameren.	Inhadia	Engrav	Cantar
Ameren.	Labaaie	enerav	center

Anner	en, Lubuule Ener	gy Center
Site#	Site Name	Parameter Monitored
01	Northwest	SO ₂ , (WS, VWS, WD, OT, σ_{ϕ} , σ_{Θ} , RH) ^{Λ}
02	Valley	SO ₂ , (WS, VWS, WD, OT, SR, BP, RH,
		Prec, σ_{ϕ} , σ_{Θ})^
03	Southwest	SO ₂
04	North	SO ₂

SODAR (WS, WD, OT, $\sigma_{\rm e,}$ $\sigma_{\rm \phi}$)^

Labadie Plant

Parameter Monitored
Pb
(WS, WD, OT, SR, BP, RH, Prec, σ_{Θ})^a
Pb
Pb
Pb

Acronyms SO₂ Sulfur Dioxide

SO ₂	Sulfur Dioxide
Pb	Lead (High Volume)
$\sigma_{\rm e}$	Sigma Theta (Standard Deviation of Horizontal Wind
	Direction
WS	Resultant Wind Speed
WD	Resultant Wind Direction
OT	Outside Temperature
SR	Solar Radiation
BP	Barometer Pressure
RH	Relative Humidity
σ_{ϕ}	Sigma Theta (Standard Deviation of the Vertical Wind
	Speed)
Prec	Precipitation
VWS	Vertical Wind Speed

Ameren, Rush Island Energy Center

Site#	Site Name	Parameter Monitored
11	Weaver-AA	SO ₂
12	Johnson Tall Tower	(WS, VWS, WD, OT, σ_{φ} , σ_{Θ})^
13	Natchez	SO ₂
14	Fults, IL	SO_2 , (WS, VWS, WD, OT, SR, BP, R
		Prec, σ_{ϕ} , σ_{Θ})^

Doe Run, Glover

Site#	Site Name	Parameter Monitored
15	Post Office #2*	Pb
16	Big Creek*	Pb

Doe Run, Buick

Site Name	Parameter Monitored
Buick NE	Pb
Buick North#5*	Pb
Buick South#1*	Pb, (WS, WD, OT, SR, BP, RH, Prec, $\sigma_{\!\Theta}$) $_{\mbox{\tiny AB}}$
Hwy 32 Northeast	SO ₂
West Entrance	SO ₂
County Road 75	SO ₂
	Buick NE Buick North#5* Buick South#1* Hwy 32 Northeast West Entrance

Parameter Monitored

Magnitude 7 Metals Site# Site Name

23	Site #1	SO ₂
24	Site #2	SO ₂
25	Site #3	SO ₂ , (WS, WD, OT)

- a Metrological Data is not submitted to the EPA Air Quality (AQS) Database
- Regulatory Dispersion Modeling Grade Parameters
- Non-Ambient Monitor

Monitoring Network and Proposed Changes

1. Lead (Pb) Monitoring Network

Changes to airborne lead (Pb) requirements in 2010 require monitoring lead sources emitting 0.50 tons per year (tpy) or more, revised from the previous requirement for monitoring sources emitting one ton per year or more. (All airports in Missouri are exempt from this requirement.) Review of current 2018 emission data did not identify any new sources emitting greater than 0.50 tpy. The Department will continue to review emission data for new sources in the future.

1.1 Doe Run Operated Sites

Doe Run operates lead monitoring sites in the vicinity of its industrial facilities in Herculaneum, Glover and Boss. Operation of some of these sites is required by consent judgments or agreements with the Department, and operation of other sites is voluntary.

Doe Run Herculaneum also operates one 10 meter tower meteorological monitoring site as per language set forth under the 2011 Consent Judgment. Doe Run Herculaneum discontinued the 40 meter tower at Broad Street as per the Consent Judgment.

Effective Jan. 1, 2020, Doe Run made the following changes in its Herculaneum monitoring network: sampling frequency at North Cross was reduced to every third day, collocated monitoring at Church Street was discontinued, and monitoring at Sherman was discontinued. We believe that these changes do not require Department or EPA approval, and the Department informed EPA Region 7 of these changes on Sept. 30, 2019.

Doe Run monitoring activities are currently designated as three separate Primary Quality Assurance Organizations (PQAO): Doe Run Buick, 1288; Doe Run Glover, 1289; and Doe Run Herculaneum, 1290. The Department proposes to combine these into a single PQAO (1290) effective Jan. 1, 2021. Department staff informed EPA Region 7 staff of this proposed change by email in March 2020, and EPA staff requested by email in April 2020 that the proposed change be included in this Monitoring Network Plan. The three Doe Run networks are all using the same analytical laboratory for lead analysis and the same contractor for assistance in developing QAPPs and providing QA audits. Consolidation would improve efficiency and cost-effectiveness for the Missouri-implemented federally-equivalent performance evaluation program (PEP) audits for lead.

The justification for this consolidation is based on EPA's definition and description of a PQAO found in 40 CFR Part 58 Appendix A Section 1.2 and on the October 2015 EPA Office of Air Quality Planning and Standards (OAQPS) technical memorandum regarding consolidation of industrial PQAOs for monitoring under the SO₂ Data Requirements Rule (DRR). The DRR memorandum provides clarification of the EPA OAQPS position on industrial networks submitting data to AQS for NAAQS determinations. In general, OAQPS has indicated that it prefers consolidation of PQAOs in most cases.

The three industrial monitoring organizations share the same overall corporate management structure (The Doe Run Company) although they are associated with three separate facilities that are geographically distant from each other. All three organizations are monitoring for lead under AQS Parameter code 14129 and reporting data to AQS in the same units. For this consolidation proposal, Missouri has a precedent set with Ameren Missouri with the classification of two-separate source-oriented industrial networks under the same corporate structure merged into one PQAO. 40 CFR 58 Appendix A defines a PQAO as a monitoring organization or a group of monitoring organizations that is responsible for a set of stations that monitors the same pollutant and for which data quality assessments will be [likely] pooled. Since data quality assessments are made and data certified at the PQAO level, the monitoring organization identified as the PQAO is responsible for the oversight of the quality of data of all monitoring organizations within the PQAO. Each PQAO shall be defined such that measurement uncertainty among all stations in the organization can be expected to be reasonably homogeneous as a result of common factors. EPA defines common factors that should be considered in defining PQAOs to include:

- (a) Operation by a common team of field operators according to a common set of procedures.
- (b) Use of a common QAPP or Standard Operating Procedures (SOP).
- (c) Common calibration facilities and standards.
- (d) Oversight by a common quality assurance organization.
- (e) Support by a common management organization (i.e., state agency) or laboratory.

Application of each of these factors to Doe Run air monitoring is discussed below:

(a) Operation by a common team of field operators is unlikely when different organizations are merged that are geographically separated. This would seem to be a barrier to consolidation. However, the 2015 DRR memo appears to deemphasize this component, especially when it involves industrial monitoring organizations and oversight by State agencies. EPA OAQPS has expressed that it supports PQAO consolidation and increased oversight by State agencies for NAAQS projects. In the DRR memo, OAQPS even made the argument that industrial organizations could be combined into the State PQAO despite not sharing a common group of site operators. Missouri's involved approach to industrial monitoring networks results in ensuring consistency of procedures and data measurement quality requirements. This approach ensures industry network procedures are consistent with each other and with state-operated sampling procedures.

The three Doe Run networks currently operate under separate QAPPs and SOPs. The Department assists the industry operators in developing these documents. Each organization has a separate QAPP, but they are virtually identical in the Data Quality Objectives (DQOs) and Measurement Quality Objectives (MQOs). The Department takes responsibility for all quality system documentation for all industry-operated air monitoring projects in the state. All Doe Run QAPPs are subject to review and approval by the State agency prior to monitoring. For all industry NAAQS monitoring projects, Missouri oversight includes review and approval of all QAPPs and SOPs. This process ensures each project quality system and standard operating procedures are consistent with procedures employed by the Missouri State monitoring network. Each industry QAPP

specifies full compliance with the requirements contained in 40 CFR 58 Appendix A and also requires compliance with the data validation criteria tables for Pb-TSP contained in the 2017 EPA QA Handbook (document EPA-454/B-17-001). The three QAPPs are virtually the same for sampling methods, analysis methods, and requirements for the data. In addition, the Department uses a template to standardize the industry project QAPP formats. Doe Run has also relied on the same professional contract organization to prepare the QAPPs and SOPs for submittal to the Department. All three organizations are subject to the Missouri Quality Management Plan (QMP) approved by EPA Region 7.

- (b) For lead sampling, the calibration reference standards consist of a high-volume flow rate measurement system that includes sensors to measure ambient temperature and barometric pressure. All three Doe Run monitoring organizations rely primarily on Tisch Environmental Inc. for annual flow device certifications. Tisch is a manufacturer and primary supplier of high-volume air sampling equipment. All three organizations use reputable vendors to recertify temperature and pressure measurement sensors. All three organizations rely on internal network audits from a professional monitoring and auditing organization, Inquest Environmental. The internal audits serve to verify the accuracy and consistency of flow rate measurement standards. The Missouri Department of Natural Resources quality assurance laboratory is also available for certifications or verifications of measurement systems.
- (c) For all industrial source-oriented PQAOs, Missouri establishes QA independence, wherein the State agency functions as the independent QA management organization. All three Doe Run facility monitoring operations are served by the Department's Air Pollution Control Program for quality assurance management functions. The Department has sufficient technical expertise and management authority to conduct independent oversight and assure the implementation of each organization's quality system for ambient air quality monitoring. The Department is organizationally independent of environmental data generation activities performed by industrial sources. As part of the quality management function for industrial monitoring, the Department's Air Pollution Control Program and Air Quality Assurance Unit ensure the full implementation of the EPA National Performance Evaluation Programs (NPEP) for lead at all sample collection sites and at each analysis laboratory. Department QA personnel perform Technical Systems Audits (TSA) on industrial PQAOs every three years. These audits includes visits to the air monitoring sites for technical audits. The Department is also responsible for compliance with siting criteria specified in 40 CFR 58 Appendix E. The Department actively provides technical assistance to industrial monitoring organizations to ensure compliance with all data quality objectives. In addition to the QA related documentation and programs, the Department is responsible for the inclusion in the Monitoring Network Plan (this plan) of the industry-operated monitoring sites that report data to AQS. The Department is also responsible for the annual data certification procedures in AQS for industry-generated ambient air quality data. The Department ensures the raw data and QA data received from the three Doe Run networks meet the appropriate monitoring requirements. In recent years, Doe Run has standardized its operations including data processing and reporting across the three networks.

(d) All three organizations are currently supported by the same sample analysis laboratory, the Doe Run SEMO Central Laboratory located in Viburnum, Missouri. For filter analysis, SEMO uses inductively-coupled plasma mass spectrometry (ICP-MS) with abbreviated AQS method code 192. EPA has designated this analysis method as manual equivalent method EQL- 0710-192. The Doe Run method was originally developed by EPA Region 9. The official description is "Heated Nitric Acid Hot Block Digestion and ICP/MS Analysis for Pb on TSP High-Volume Filters." The EPA FEM designation for this method was published in the Federal Register in August 2010.

1.2 St. Joe State Park Monitoring Site

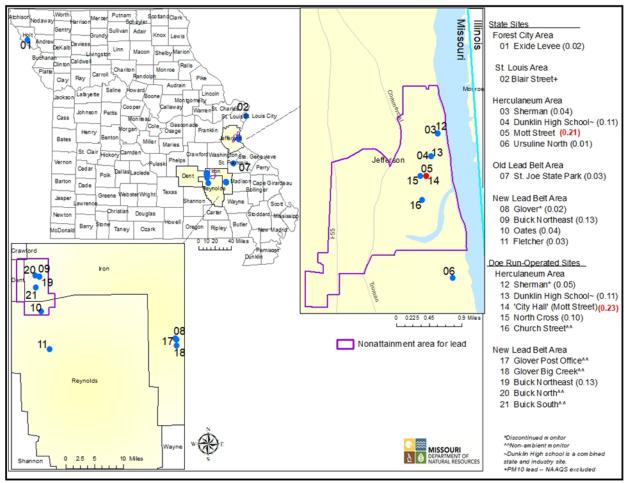
The St. Joe State Park site was intended to monitor airborne lead concentrations during remediation activities involving old lead mining waste in the Federal Mine tailings. The bulk of the remediation activity was completed as of late July/early August 2014. The three-month rolling average has not exceeded the lead standard, 0.15 $\mu g/m^3$, since the site began monitoring lead on July 1, 2010. The highest three-month rolling average airborne lead concentration at that site was 0.14 $\mu g/m^3$ in July-September 2011. This elevated lead concentration was attributable to remediation activities near the monitor. During 2017 to 2019, the three-month average lead concentration has not exceeded 0.03 $\mu g/m^3$.

1.3 Glover Lead Monitor

The Department discontinued the Glover lead monitor at the end of April 2019 as proposed in the 2018 Monitoring Network Plan, which was approved by EPA.

The 2020 lead monitoring network is shown in the following map.

2020 Missouri Lead Monitoring Network*, NAAQS=0.15µg/m³ (3 month). (Numbers in parenthesis are 2017-2019 Design Values)



^{*}Effective Jan. 1, 2020, Doe Run made the following changes in its Herculaneum monitoring network: sampling frequency at North Cross was reduced to every third day, collocated monitoring at Church Street was discontinued and monitoring at Sherman was discontinued. No other changes are proposed in this plan.

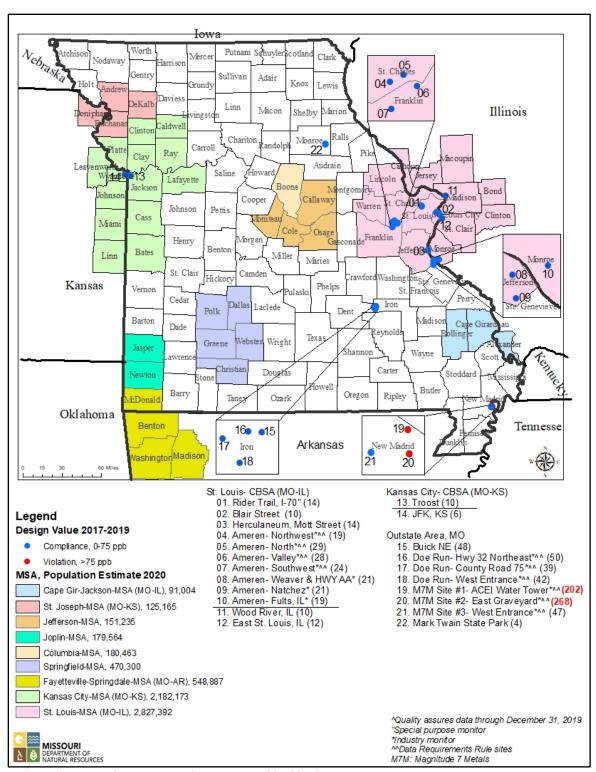
2. Sulfur Dioxide (SO₂) Monitoring Network

EPA reviewed the SO₂ standard and announced in March 2019 the standard would remain at 75 parts per billion (ppb), established in 2010. The *2011 Monitoring Network Plan* identified the minimum network monitoring required by the Population Weighted Emissions Index (PWEI). This analysis was updated using 2019 estimated population data from the United States Census Bureau and 2017 National Emission Inventory (NEI) emissions data. Results are summarized in the following table. The required numbers of monitoring sites based on the PWEI are two sites in the St. Louis CBSA, one site in the Kansas City CBSA and no others required in Missouri CBSAs. This requirement is met in the St. Louis area by the Blair Street site in Missouri and the East St. Louis site in Illinois and in the Kansas City area by the Troost site. The requirements are exceeded if the Wood River site in Illinois, the Herculaneum site in Missouri and the JFK site in Kansas are also considered. The East St. Louis site is expected to continue based on communication received from the Illinois Environmental Protection Agency.

In addition to the minimum network requirements detailed above, the Department oversees several industrial SO₂ monitoring sites and one additional site, all detailed in the following sections.

Area	Estimated	2017	PWEI	Required Number
	2019 Population	SO2 Emissions (tpy)		of SO2 Monitors
Kansas City	2,157,990	9,703.06	20,939	1
St. Louis	2,803,228	67,179.86	188,320	
Fayetteville-Springdale-Rogers	557,741	2,450.66	1,367	0
Springfield	470,300	3,477.18	1,635	0
Joplin	179,564	1,244.75	224	0
Columbia	180,463	1,560.22	282	0
Jefferson City	151,235	773.09	117	0
St. Joseph	125,223	561.49	70	0
Cape Girardeau	96,765	714.96	69	
Maryville	22,092	165.46	4	0
Warrensburg	54,062	65.01	4	0
Marshall	22,761	58.77	1	0
Sedalia	42,339	195.16	8	0
Branson	87,520	709.18	62	0
Kirksville	30,003	150.29	5	0
Moberly	24,748	16,556.63	410	0
Lebanon	35,723	187.95	7	0
Mexico	25,388	48.62	1	0
Fort Leonard Wood	52,607	128.70	7	0
Rolla	44,573	172.68	8	0
West Plains	40,117	293.39	12	0
Fort Madison-Keokuk	58,162	998.13	58	0
Quincy	75,211	895.05	67	0
Hannibal	38,839	859.58	33	0
Farmington	67,215	168.78	11	0
Poplar Bluff	42,478	179.61	8	0
Sikeston	38,280	4,746.17	182	0
Kennett	29,131	42.02	1	0
PWEI=population*SO2(tpy)/1,0	000.000			
- (1)//				
PWEI > 1,000,000: 3 monitors				
1,000,000 > PWEI <u>></u> 100,000: 100,000 > PWEI <u>></u> 5,000: 1 mg				

2020 Missouri Sulfur Dioxide (SO₂) Monitoring Network*, NAAQS=75 ppb (1 hour). (Numbers in parentheses are 2017-2019 Design Values)



^{*}No changes to the SO₂ network are proposed in this plan.

In 2015, EPA finalized the SO₂ Data Requirements Rule (DRR). This rule required air agencies to characterize air quality, either by monitoring or modeling, around sources that emit 2,000 tons per year (tpy) or more of SO₂.

Sources monitoring due to the DRR include: Ameren Labadie Energy Center, Magnitude 7 Metals (formerly Noranda Aluminum), and Doe Run Buick Resource Recycling Facility. In addition, Ameren Rush Island Energy Center is conducting monitoring on an accelerated schedule (compared to the DRR timeline) based on an agreement with the Department associated with the Jefferson County nonattainment plan submitted to EPA in May 2015. The monitoring of these sources is discussed in the following sections.

The industrial sources are conducting the monitoring, but they are conducting it in accordance with the SLAMS requirements in 40 CFR Part 58. The Department reviewed and approved the siting of the monitors based on federal regulations. To meet the requirements of the DRR, these monitors will need a minimum of three years of monitoring data, which is now complete. However, the sources cannot discontinue monitoring thereafter without EPA approval based on the requirements of 40 CFR 51.1203(c)(3) or 40 CFR 58.14.

2.1 Industrial SO₂ and Meteorological Monitoring near the Labadie and Rush Island Energy Centers

Ameren operates two SO₂ ambient Air Monitoring networks around the Labadie and Rush Island power plants. These monitors are classified as industrial SO₂ monitors. The following sections describe the current status of the Labadie and Rush Island SO₂ monitoring networks.

2.1.1 Labadie Energy Center

Two industrial SO₂ ambient air monitoring sites and a meteorological monitoring station began operation in April 2015 in the area around the Ameren Labadie Energy Center, located at 226 Labadie Power Plant Road in Franklin County. Two additional industrial SO₂ monitoring sites southwest and north of the Labadie Energy Center were installed and began operation on Jan. 1, 2017. In addition, meteorological monitoring using a 10 meter tower was added at the Northwest site. A sound detection and ranging (SODAR) instrument was initially located at the Valley site, relocated to the Northwest site in February 2017, and relocated again to the Labadie plant site in August 2017. These monitoring sites (see the following table) are operated by Ameren under a Department-approved Quality Assurance Project Plan (QAPP). The rationale for site selection based on modeling results is discussed extensively in the 2015 and 2016 Monitoring Network Plans. These monitors have not shown violation of the NAAQS, and the Department will be recommending later in 2020 that EPA redesignate the area around this facility from unclassifiable to attainment.

Summary of Labadie Area Industrial Monitoring Stations:

Monitoring Objective: Source Oriented

Spatial Scale of representativeness: Middle Scale (100 square meters [m²] to 0.5 square kilometer [km²])

Labadie Northwest -SO₂, 10 Meter Meteorological Station. (Latitude: 38.5818

Longitude: -90.865528)

Labadie Valley -SO₂, 10 Meter Meteorological Station. (Latitude: 38.572522

Longitude: -90.796911)

Labadie Southwest -SO₂, (Latitude: 38.52825 Longitude: -90.86301) Labadie North -SO₂, (Latitude: 38.59557 Longitude: -90.82864) Labadie Plant -SODAR, (Latitude: 38.54860 Longitude -90.83750)

2.1.2 Rush Island Energy Center

On March 23, 2015, the Department and Ameren entered into a consent agreement (see Appendix 3 of the 2015 Monitoring Network Plan) that included Ameren installing and operating an SO₂ monitoring network around the Rush Island Energy Center under Department oversight. The siting of these monitors was consistent with the technical process described in the SO₂ DRR.

The Rush Island monitoring network design was based on evaluation of dispersion modeling, as described in the 2015 and 2016 Monitoring Network Plans. This network began operation in December 2015.

Summary of Rush Island area Industrial Monitoring Stations:

Monitoring Objective: Source Oriented

Spatial Scale of representativeness: Middle Scale (100 m² to 0.5 km²) Weaver-AA -SO₂. (Latitude: 38.144529 Longitude: -90.304726)

Natchez -SO₂, (Latitude: 38.10525 Longitude: -90.29842)

Fults, IL, -SO₂, 10 Meter Meteorological Station (Latitude: 38.15908 Longitude: -90.22728) Johnson Tall Tower -Meteorological Station Only, anemometers at 62.5 meter (m) and 132.5 m

levels (Latitude: 38.11999 Longitude: -90.28214)

2.2 Industrial SO₂ and Meteorological Monitoring near the Doe Run Buick Resource Recycling Facility

The Doe Run Company began SO₂ monitoring at three sites in the area around the Buick Resource Recycling Facility near Boss starting Jan. 1, 2017. Meteorological monitoring is also conducted at the Buick South lead monitoring site, south of the facility. These sites are operated under a Department-approved QAPP, which includes performance evaluations (audits) by Department staff. Locations of these ambient SO₂ monitoring sites was determined on the basis of air quality modeling of the impact of facility emissions, as described in the 2016 Monitoring Network Plan. These monitors have not shown violation of the NAAQS, and the Department has recommended the area surrounding this facility in Iron County be designated as attainment/unclassifiable. EPA is expected to act on this recommendation by the end of 2020.

Summary of Doe Run Buick area Industrial Monitoring Stations:

Monitoring Objective: Source Oriented

Spatial Scale of representativeness: Middle Scale (100 m² to 0.5 km²) West Entrance -SO₂. (Latitude: 37.63211 Longitude: -91.13565) County Road 75 -SO₂, (Latitude: 37.64876 Longitude: -91.14890)

Hwy. 32 Northeast (Former PSD site) -SO₂, (Latitude: 37.65319 Longitude: 91.12795)

2.3 Industrial SO₂ and Meteorological Monitoring near the Magnitude 7 Metals (formerly Noranda Aluminum) Facility

Magnitude 7 Metals is conducting SO₂ monitoring at three sites and meteorological monitoring at one site in the area around its facility near New Madrid. Monitoring at these sites started in January 2017. These sites are operated under a Department-approved QAPP, which includes performance evaluations (audits) by Department staff. Locations for these ambient SO₂ monitoring sites were determined on the basis of air quality modeling of the impact of facility emissions, and the potential area for meteorological monitoring was determined on the basis of an analysis by a Department meteorologist. These evaluations are described in the 2016 Monitoring Network Plan.

Two of the Magnitude 7 Metals sites are in violation of the NAAQS based on 2017 through 2019 data. The State of Missouri has recommended designation of an area surrounding the facility as a nonattainment area for the SO₂ NAAQS and the remainder of New Madrid County as attainment/unclassifiable. EPA is expected to act on this recommendation by the end of 2020.

Summary of Magnitude 7 Metals area Industrial Monitoring Stations:

Monitoring Objective: Source Oriented

Spatial Scale of representativeness: Middle Scale (100 m² to 0.5 km²)

Site 1 -SO₂, (Latitude: 36.51361 Longitude: -89.56111) Site 2 -SO₂, (Latitude: 36.50861 Longitude: -89.56083)

Site 3 -SO₂ and Meteorology, (Latitude: 36.50889 Longitude: -89.57083)

2.4 Rider Trail I-70 Site

The Department added an SO₂ monitor, designated as SPM, to the existing Rider Trail I-70 monitoring site in May 2016 to evaluate SO₂ levels in the general area. Since the site was installed the annual fourth highest daily one-hour SO₂ concentration has ranged from 12 to 15 ppb.

Since the monitor is located in the near-roadway environment, and there are several SO₂ sources in the area, the Department initially classified the spatial scale of representativeness of the SO₂ measurements as middle-scale. This classification may be reevaluated if trends in the monitoring data and other analysis warrant increasing the spatial scale of representativeness. The monitoring objective for this monitor is to measure population exposure.

3. National Air Toxics Trends Stations (NATTS), and Other Non-Criteria Pollutant Special Purpose Monitoring

3.1 National Air Toxics Trends Stations Monitoring

Routine NATTS monitoring will continue at Blair Street as described in the NATTS work plan.

3.2 Black Carbon

Black Carbon is monitored with an aethalometer as part of the NATTS program at Blair Street. Also, as part of the condition of receiving one time section 103 grant funds to implement sites for the near-roadway monitoring network, the Department will continue to conduct special purpose PM_{2.5} black carbon monitoring at the Forest Park and Blue Ridge I-70 near- roadway NO₂ sites using aethalometers.

4. PM_{2.5} Monitoring Network

4.1 PM_{2.5} SLAMS Network

The minimum monitoring requirement, based on population and historic PM_{2.5} measurements (40 CFR 58 Appendix D) requires three sites in St. Louis (because of PM_{2.5} concentrations measured on the Illinois side) and two sites in Kansas City. The St. Louis requirement is met by four Missouri sites plus three Illinois sites in the St. Louis CBSA (in addition to the near-road sites). The Kansas City requirement is met by three Missouri sites plus three Kansas sites in the Kansas City CBSA (in addition to the near-road site).

There is only one PM_{2.5} monitor in Missouri that is not applicable for comparison to the annual NAAQS. The Branch Street site is a middle-scale site focused on a group of sources in the industrial riverfront area and is not representative of neighborhood or larger spatial scale for PM_{2.5} monitoring. The PM_{2.5} monitors deployed to collocate with the near-roadway NO₂ monitors are micro-scale monitors, but EPA has indicated in 40 CFR 58 Appendix D, 4.7.1(c)(2) that "In many situations, monitoring sites that are representative of microscale or middle-scale impacts are not unique and are representative of many similar situations. This can occur along traffic corridors or other locations in a residential district. In this case, one location is representative of a number of small scale sites and is appropriate for evaluation of long-term or chronic effects." EPA may consider these monitors representative of larger areas near roadways and comparable to the annual PM_{2.5} NAAQS consistent with 40 CFR 58.30.

The requirement for regional background PM_{2.5} monitoring is met by the Hercules Glades and Mingo Interagency Monitoring of Protected Visual Environments (IMPROVE) sites. In addition to these sites, the Arnold West and El Dorado Springs sites also serve to monitor transport into eastern and western Missouri urban areas respectively.

TEOM-1405-DF and TEOM-1405-F instruments are the primary instruments being used in the state network for $PM_{2.5}$ measurement. EPA has also designated the TEOM-1405-DF, operating with firmware version 1.70 and later, as a Federal Equivalent Method (FEM) for PM_{10} and $PM_{10-2.5}$, announced on Nov. 12, 2013. However, the Department does not report data from the PM_{10} FEM channels of the TEOM-1405-DF instruments to AQS.

Network PM_{2.5} 1405-DF FEM/FRM collocation requirements are satisfied at the Blair Street NCore site in St. Louis. The following figure shows FRM/FEM comparability statistics (Class III performance criteria of 40 CFR Part 53) for the TEOM-1405-DF (EQPM-0609-182) operating at the Blair Street, St. Louis site. The additive and multiplicative bias meets the Class III performance criteria of 40 CFR Part 53.

The Department has begun the process of obtaining retrofits of the 1405-DF instruments to 1405-Fs. To date (June 2020) 1405-F instruments are being operated at six sites; see the table at the end of this section. Two additional sites (St. Joseph; two monitors and Richards Gebaur South) are planned to be converted to 1405-F operation in 2021, subject to the availability of funds. The "Revisions to Ambient Monitoring Quality Assurance and Other Requirements; Final Rule," (Federal Register, volume 81, number 59, March 28, 2016), effective April 27, 2016, removed

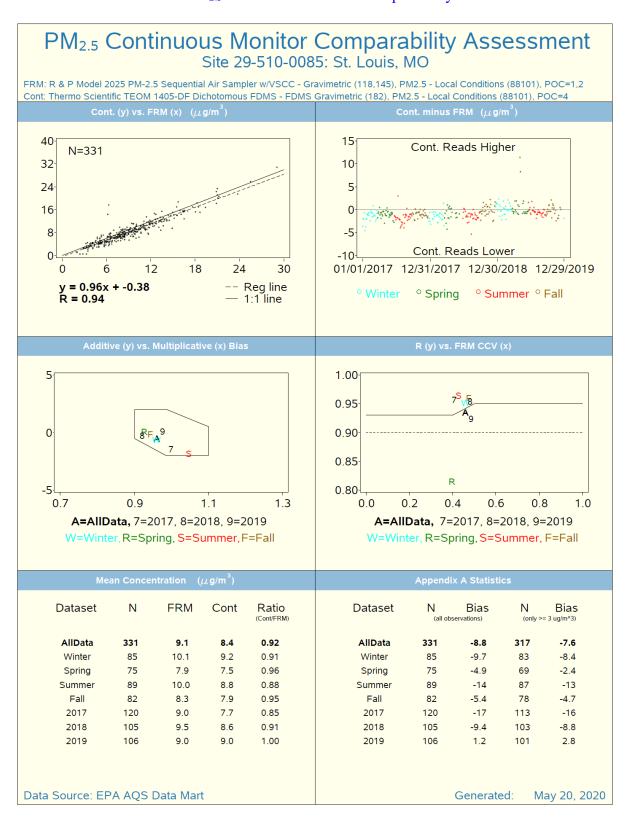
the requirement for collocated monitoring for PM_{10-2.5} at NCore sites from 40 CFR Part 58. Therefore, operation of the collocated set of filter samplers used for measurement of PM_{10-2.5} was discontinued at the Blair Street site. At the same time, the TEOM-1405-DF FEM was re-designated as the primary PM_{2.5} instrument at this site. The FRM PM_{2.5} sampler at Blair Street was re-designated as the collocated reporting FRM sampler for the state network, and also provides FRM PM_{2.5} for the NCore site. This change allowed the collocated FRM PM_{2.5} sampler at the Troost site to be discontinued. Effective July 1, 2018, PM_{10-2.5} is now being reported only at the Blair Street NCore site and the Forest Park and Blue Ridge I-70 near road sites. The current PM_{2.5} network is summarized in the table entitled "2020 Missouri PM_{2.5} Monitoring Network" later in this section.

Two TEOM-1405-DF instruments are operated at the St. Joseph Pump Station site, one designated as primary, and one as collocated to satisfy the collocation requirement for that FEM method. The Department will continue to operate a 1405-F PM_{2.5} instrument and a collocated FRM at Ladue.

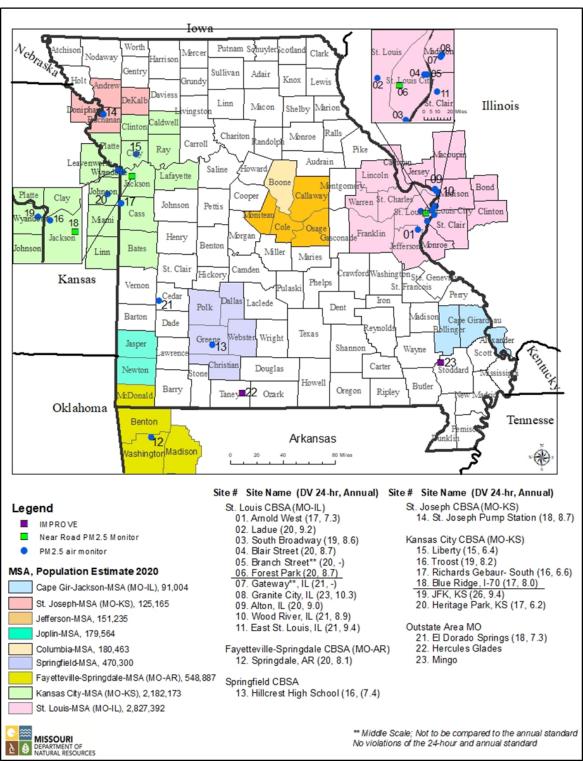
The Department is also operating two Teledyne API 640x instruments at Blair Street and one at Troost as a special purpose monitor for PM₁₀ measurement and to evaluate this instrument, which measures airborne particulate concentration using light scattering, for possible future use in the PM_{2.5} network. The two 640x instruments at Blair Street are showing excellent agreement. Therefore, in order to further evaluate the instrument, one of the 640x instruments at Blair Street will be relocated to the Branch Street in order to evaluate its performance in a location with a higher atmospheric particulate concentration. This relocation is tentatively planned for June 2020.

FRM/FEM Comparability Assessment Blair Street, St. Louis, 2017-2019

from EPA PM_{2.5} Continuous Monitor Comparability Assessments



2020 Missouri PM_{2.5} Monitoring Network*, NAAQS=35 μg/m³ (24 hours), 12 μg/m³ (Annual). (Numbers in parentheses are 2017-2019 Design Values for the 24-hour and Annual standards)



^{*}No changes to the PM_{2.5} network are proposed in this plan other than continuing retrofitting of 1405-DF instruments to 1405-F.

4.2 PM_{2.5} Chemical Speciation Network (CSN)

PM_{2.5} speciation sampling is currently conducted at two locations: Blair Street in St. Louis and Arnold West. The sampling schedule at Arnold West was modified to every six days in February 2015. Sampling is done every three days at Blair Street.

4.3 PM_{2.5} Section 103 Federal Funding

The Department is not proposing any changes to the PM_{2.5} monitoring network other than replacement of aging equipment. However, this plan is contingent on EPA providing adequate grant funds to operate and maintain the PM_{2.5} monitoring network.

40 CFR 58.14 (c) indicates "State, or where appropriate, local agency requests for SLAMS monitor station discontinuation, subject to the review of the Regional Administrator, will be approved if any of the following criteria are met and if the requirements of appendix D to this part, if any, continue to be met. Other requests for discontinuation may also be approved on a case-by-case basis if discontinuance does not compromise data collection needed for implementation of a NAAQS and if the requirements of appendix D to this part, if any, continue to be met." Consistent with 40 CFR 58.14(b), if reductions become necessary, the Department will provide written communication describing the network changes to the EPA Regional Administrator for review and approval.

2020 Missouri PM_{2.5} Monitoring Network

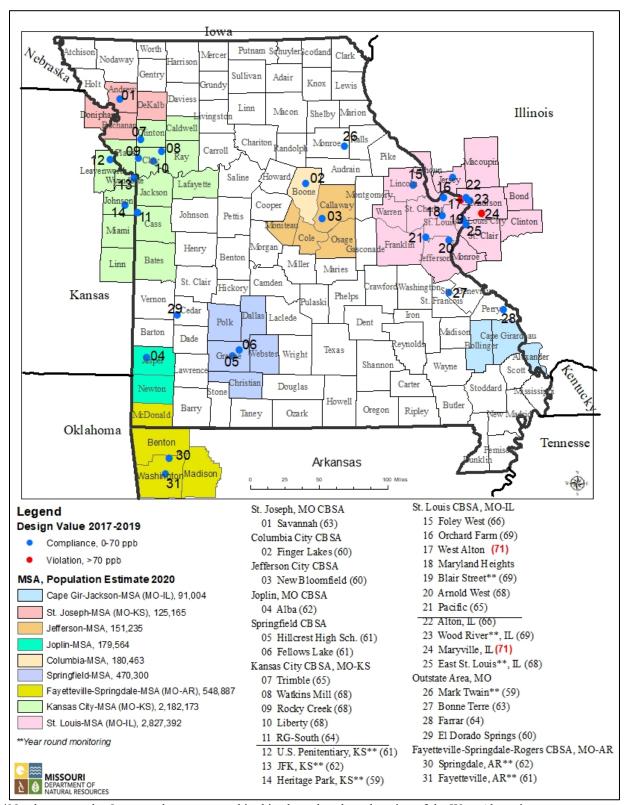
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		24 hr & Annual NAAQS/AQI
TEOM-1405-F FEM	ESP	24 hr & Amrual NAAQS/AQI
T640X PM Mass Monitor FEM	ESP	Method Performance Evaluation/Research Not for NAAQS Compliance Determination
TEOM-1405-DF FEM	ESP	24 hr & Annual/AQI, PM10-2.5 continuous (micro scale monitor)
TEOM-1405-DF FEM	ESP	24 hr & Annual NAAQS/AQI
TEOM-1405-DF FEM	ESP	24 hr & Annual NAAQS/AQI
TEOM-1405-DF FEM	ESP	24 hr & Annual NAAQS/AQI
Collocated TEOM-1405-DF FEM	ESP	Quality Assurance
TEOM-1405-F FEM	ESP	24 hr & Ammual/AQI
IMPROVE	Fish & Wildlife Service	Chemical Speciation Network
IMPROVE	Forest Service	Chemical Speciation Network
	TEOM-1405-DF FEM Collocated TEOM-1405-DF FEM TEOM-1405-F FEM IMPROVE IMPROVE	TEOM-1405-DF FEM ESP Collocated TEOM-1405-DF FEM ESP TEOM-1405-F FEM ESP Fish & Wildlife IMPROVE Service

5. Ozone Monitoring Network

There are no planned changes to the ozone monitoring network other than modification of the West Alton site as described below. Ozone monitoring will continue all year at the Mark Twain State Park (MTSP) site to collect ozone background concentrations need for Prevention of Significant Deterioration (PSD) modeling projects and at Blair Street to meet the NCore ozone monitoring requirement. The current monitoring network is based on the current ozone standard and ground-level ozone air quality monitoring network design requirements. The current ozone monitoring network meets the population-based requirements in 40 CFR 58 Appendix D, which requires a minimum of two sites each in the St. Louis, Kansas City and Springfield areas. The ozone monitoring requirement for the Fayetteville-Springdale-Rogers CBSA is met by two ozone monitoring sites in Arkansas, since 96% of the population of that CBSA is in Arkansas and only 4% in Missouri.

The West Alton site is located about 16 miles north of the center of St. Louis between the Missouri and Mississippi rivers and about seven miles northwest of their confluence. The West Alton area is relatively flat, with elevation about 420 to 430 feet above sea level. The area is subject to flooding when the water level in the rivers rises, and there was widespread flooding in the area during spring and early summer 2019. The site was inoperative from May 2 to 16 and May 22 to July 16, 2019, because it was removed to avoid damage due to flooding. The Department has evaluated the days with missing O₃ measurement at West Alton based on temperature and on ozone concentrations measured at nearby sites. Based on this evaluation, 62 of the 72 missing days were not conducive to ozone concentrations above the level of the standard. This evaluation has been submitted to EPA Region 7 for approval. If this analysis is acceptable to EPA, the data completeness requirement for the site will still be met in 2019. However, because of its importance as the design value site for the St. Louis area, a cost estimate and plan are being developed for elevation of the West Alton monitoring site above the 2019 high water level while still meeting probe height requirements to minimize outages related to flooding in future years.

2020 Missouri Ozone (O₃) Monitoring Network*, NAAQS=70 ppb (8 hour). (Numbers in parentheses are 2017-2019 Design Values)



^{*}No changes to the O₃ network are proposed in this plan other than elevation of the West Alton site.

6. PM₁₀ Monitoring Network

The Department discontinued collocated FRM PM₁₀ monitoring at the Blair Street in St. Louis in February 2018, because the FRM PM₁₀ measurement has been replaced as the primary measurement with the Teledyne API 640X instrument. Collocation is only required for manual samplers (40 CFR 58 Appendix A, 3.3.4). The Department also discontinued the other FRM PM₁₀ monitor at the Blair Street site effective July 1, 2019, because the Teledyne API 640X was designated as the primary PM₁₀ instrument and is also being used to report PMCoarse.

The St. Louis CBSA includes four PM₁₀ sites (not including the microscale Forest Park site), enough to meet the minimum monitoring requirement of four to eight sites specified in 40 CFR 58 Appendix D, 4.6. This monitor count includes the Granite City Fire Station site in Illinois, which is expected to continue based on communication received from the Illinois Environmental Protection Agency.

The PM₁₀ minimum monitoring requirement of two to four sites in the Kansas City CBSA is met by the Front Street site in Missouri and the JFK site in Kansas. The JFK site will continue, because it is the NCore site for the Kansas City area, as confirmed by the 2020 Kansas Air Monitoring Network Plan.

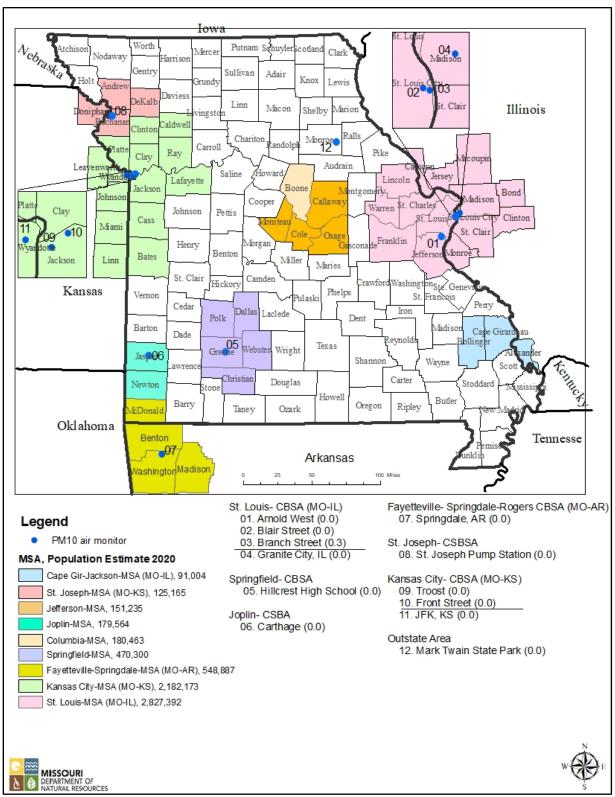
In February 2019, the Department began monitoring PM_{10} and $PM_{2.5}$ at Troost with a Teledyne API 640X instrument as a special purpose monitor for the purpose of ongoing evaluation of the performance of that instrument.

The PM₁₀ minimum monitoring requirement of zero to one in the Springfield CBSA is met by the Hillcrest High School site. The 2019 estimated population of the Springfield CBSA is 470,300. If this population increases to 500,000 or more, the requirement will increase to one to two sites and will continue to be met.

The 2019 estimated population of the Fayetteville-Springdale-Rogers CBSA is 557,741, but only 4% of this population (22,837) is in Missouri. Therefore, the PM₁₀ monitoring requirement for this area is best met by a monitoring site in Arkansas. Based on correspondence from the Arkansas Department of Environmental Quality, such a site was established on Jan. 1, 2017.

A collocated PM₁₀ TEOM-1400ab monitor was installed at the Carthage site in April 2016 and continues to operate because of the importance of that site as being near a potential source.

2020 Missouri PM_{10} Monitoring Network*, NAAQS=150 $\mu g/m^3$ (24 hour). (Numbers in parentheses are 2017-2019 Design Values)



^{*} No changes to the PM₁₀ network are proposed in this plan.

7. Nitrogen Dioxide (NO₂) Monitoring Network

The 2010 NO₂ NAAQS revision rule required near-road NO₂ monitoring at two sites in the St. Louis CBSA (population 2.8 million) and one site in the Kansas City CBSA (population 2.2 million), based on population and traffic count. The Department established the first St. Louis area site in January 2013, the Kansas City area site in July 2013, and the second near-roadway site in the St. Louis area in January 2015.

The first St. Louis area near-roadway site, Forest Park, is located adjacent to I-64 west of downtown St. Louis. Air monitoring results at that site are consistent with commuter traffic, heaviest on weekday mornings. The second St. Louis area site, called Rider Trail, I-70, is adjacent to Interstate 70, just west of Interstate 270. Interstate 70 extends across the United States and carries through traffic in addition to commuter traffic and other local traffic. Therefore, the fleet mix and congestion patterns relative to time of day and day of the week are expected to be different than at the first site

The community-wide monitoring network requirement of 40 CFR 58 Appendix D, 4.3.3(a) in CBSAs with population larger than 1 million is satisfied by the Troost site in Kansas City and the Blair Street site in St. Louis and exceeded if the JFK site in Kansas and the East St. Louis site in Illinois are also considered.

40 CFR 58, Appendix D, 4.3.4 includes the following additional requirement for NO₂ monitoring:

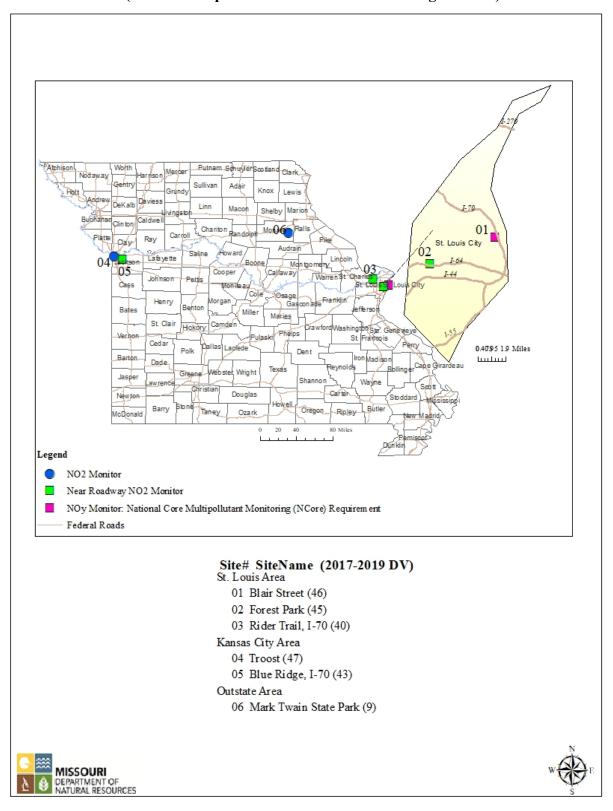
"4.3.4 Regional Administrator Required Monitoring

1. The Regional Administrators, in collaboration with States, must require a minimum of forty additional NO₂ monitoring stations nationwide in any area, inside or outside of CBSAs, above the minimum monitoring requirements, with a primary focus on siting these monitors in locations to protect susceptible and vulnerable populations...."

The Department discontinued NO₂ monitoring at the Margaretta site at the beginning of 2019 and requested that EPA designate the Blair Street site as being in an area where susceptible and vulnerable populations live, work and play, therefore meeting this requirement.

The Department is currently operating a photolytic NO₂ monitor at the Blair Street site. Photolytic NO₂ monitoring is identified in EPA's long term monitoring strategy, and this monitoring supplements the required NOy monitoring being conducted at the Blair Street NCore site. The Department plans to replace the photolytic NO₂ monitor with a cavity attenuated phase shift CAPS) NO/NO₂/NOx analyzer. Either instrument would satisfy the requirement for true NO₂ monitoring as part of the PAMS program (see Section 9).

2020 Missouri Nitrogen Dioxide (NO₂) Monitoring Network*, NAAQS=100 ppb (1 hour). (Numbers in parentheses are 2017-2019 Design Values)

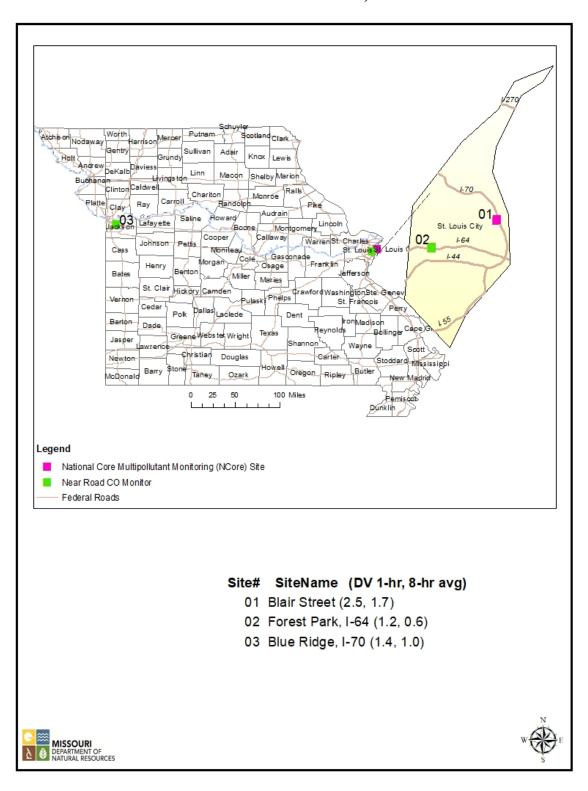


^{*}No changes to the NO₂ network are proposed in this plan.

8. Carbon Monoxide (CO) Monitoring Network

The 2013 NAAQS rule for CO requires near-road CO monitoring at one site in the St. Louis CBSA. The Department established CO monitoring sites at the same time as the NO₂ monitoring sites at the Forest Park I-40/64 and Blue Ridge I-70 near-roadway monitoring sites. No changes to the CO monitoring network are proposed in this plan.

2020 Missouri Carbon Monoxide (CO) Monitoring Network*, NAAQS=35 ppm (1 hour), 9 ppm (8 hour). (Numbers in parentheses are 2017-2019 Design Values for the 1-hour and 8-hour standards)



^{*}No changes to the CO network are proposed in this plan.

9. Photochemical Assessment Monitoring Station Implementation Plan

9.1 Introduction: Regulatory Requirements and Guidance Documents

The "National Ambient Air Quality Standards for Ozone; Final Rule," (*Federal Register*, volume 80, number 206, Oct. 26, 2015), included amendment of 40 CFR 58, Appendix D (5) to include the following:

"5. NETWORK DESIGN FOR PHOTOCHEMICAL ASSESSMENT MONITORING STATIONS (PAMS) AND ENHANCED OZONE MONITORING

1. State and local monitoring agencies are required to collect and report PAMS measurements at each NCore site required under paragraph 3(a) of this appendix located in a CBSA with a population of 1,000,000 or more, based on the latest available census figures.

2. PAMS measurements will include:

- (1) Hourly averaged speciated volatile organic compounds (VOCs);
- (2) Three 8-hour averaged carbonyl samples per day on a 1 in 3 day schedule, or hourly averaged formaldehyde;
- (3) Hourly averaged O₃;
- (4) Hourly averaged nitrogen oxide (NO), true nitrogen dioxide (NO₂), and total reactive nitrogen (NOy);
- (5) Hourly averaged ambient temperature;
- (6) Hourly vector-averaged wind direction;
- (7) Hourly vector-averaged wind speed;
- (8) Hourly average atmospheric pressure;
- (9) Hourly averaged relative humidity;
- (10) Hourly precipitation;
- (11) Hourly averaged mixing-height;
- (12) Hourly averaged solar radiation; and
- (13) Hourly averaged ultraviolet radiation...
- (g) At a minimum, the monitoring agency shall collect the required PAMS measurements during the months of June, July and August."

The same rule included amendment of 40 CFR 58.10 (a) (10) to include the following:

"A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable, in accordance with the requirements of appendix D paragraph 5(a) of this part shall be submitted to the EPA Regional Administrator no later than July 1, 2018. The plan shall provide for the required PAMS measurements to begin by June 1, 2019."

Primarily because of delays in national procurement of some of the required equipment for PAMS measurement, EPA revised this regulation to change the required start date for PAMS measurement to June 1, 2021 (*Federal Register*, volume 85, number 5, Jan. 8, 2020, page 834).

EPA has published a guidance document entitled *PAMS Required Sites Quality Assurance Implementation Plan [QAIP]*, October 2016. The QAIP provides guidance for both EPA and monitoring organizations in implementation of the above-referenced PAMS requirements. The QAIP includes the following recommendations:

"Monitoring organization PAMS Implementation Plan: The monitoring organization Implementation Plan document will specify how the monitoring organization will perform the measurements for the Required Network. The plan will include details on activities such as monitoring site location, costs and schedule of events, among other information. The plan will also include any waivers to siting or monitoring methods." (page 13).

"Monitoring organizations should have their PAMS waivers and Required Network Implementation Plans finalized by July 2017 and must have them completed by the end of October 2017.²⁰

²⁰ The regulation requires that monitoring organization Required Network IPs be developed in their Annual Network Plans due July 2018. However, in order to be operational by June 2019, it would be beneficial to have plans finalized by the end of October 2017." (page 21).

EPA has provided additional guidance including a PAMS Technical Assistance Document (TAD) and a model Quality Assurance Project Plan (QAPP), both finalized in June 2019, and draft standard operating procedures for some of the instrument systems. EPA also conducts monthly conference calls to disseminate information and guidance on PAMS monitoring.

This section of the 2018 Monitoring Network Plan was intended to fulfill the regulatory requirement in 40 CFR 58.10 (a) (10) for submittal of a PAMS implementation plan by July 2018. An earlier version of this section was included in the 2017 Monitoring Network Plan to meet the recommended schedule in the QAIP for submittal of the plan by July 2017 in advance of the regulatory requirement. The current version of this section has been revised to reflect the schedule delays, regulatory changes and EPA guidance identified above.

9.2 PAMS Measurements

The Department will conduct PAMS monitoring at the Blair Street Station in St. Louis. The Blair Street Station is an NCore site in a CBSA with a population of greater than 1 million. The Kansas City, Kansas NCore site will also be a PAMS site according to the 2020 Kansas Air Monitoring Network Plan. PAMS monitoring will begin at Blair Street by June 1, 2021 and will be conducted during the months of June, July and August each year as long as the regulatory requirements are in place and funding is available to support this activity.

The Department does not plan to request any of the waivers from EPA described in 40 CFR 58, Appendix D (5) (c) through (f).

Each of the required measurements in 40 CFR 58, Appendix D (5) (b) is discussed below.

9.2.1. Hourly Averaged Speciated Volatile Organic Compounds (VOCs)

EPA has evaluated several gas chromatographs (GC) designed to measure concentrations of hourly average speciated VOCs. EPA is developing contracts with two of the vendors of these GC systems and plans to provide an instrument from one of the vendors to each monitoring organization that is required to conduct PAMS monitoring and chooses to acquire the GC system through one of the EPA contracts. Based on information available at this time, the Department has selected the Consolidated Analytical Systems (CAS)/Chromatotec AirmOzone Auto-Gas Chromatograph with Flame Ionization Detection. Use of this system will also require procurement and installation of additional equipment and supplies, including a sampling manifold, zero air supply, gas dilution calibrator, calibration gas and associated regulators, and data logger. This list will be refined and become more detailed as more information becomes available. This element of the required PAMS measurements is clearly the one that will require the most planning and preparation and will be the most labor-intensive during each summer measurement season. The Department expects to receive the GC during June 2020 and begin familiarization with the instrument during summer 2020 in preparation for operation in 2021.

The following table lists target compounds for this measurement (carbonyl compounds included in the table will be measured in samples described under 2 below).

9.2.2 Three 8-hour Averaged Carbonyl Samples per Day on a 1 in 3 Day Schedule, or Hourly Averaged Formaldehyde

The Department will install and use a sampler capable of collecting multiple 8-hour samples using derivatized sorbent tubes according to EPA method TO-11A. An example of such a sampler is the ATEC 8000 series. The Department is not aware of an instrument currently available at reasonable cost that reliably measures hourly-averaged formaldehyde; this provision was likely written into the regulation in anticipation of future instrument development. Analysis of TO-11A samples for the carbonyls listed in the following table (identified by footnote b) will be made available by EPA using their national contract analytical laboratory.

9.2.3 Hourly Averaged O₃

Hourly averaged ozone is already measured at Blair Street as a part of the NCore requirements and will continue.

Revised PAMS Target List^a

from EPA Memorandum, October 2, 2017, "Additional Revisions to the Photochemical Assessment Monitoring Stations Compound Target List"

Existing Priority Compounds	Optional Compounds							
1,2,3-Trimethylbenzene	1,3 Butadiene							
1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene							
1-Butene	1-Pentene							
2,2,4-Trimethylpentane	2,2-Dimethylbutane							
Acetaldehyde ^b	2,3,4-Trimethylpentane							
Benzene	2,3-Dimethylbutane							
Cis-2-Butene	2,3-Dimethylpentane							
Ethane	2,4-Dimethylpentane							
Ethylbenzene	2-Methylheptane							
Ethylene	2-Methylhexane							
Formaldehyde ^b	2-Methylpentane							
Isobutane	3-Methylheptane							
Isopentane	3-Methylhexane							
Isoprene	3-Methylpentane							
M/P Xylene	Acetone							
M-Ethyltoluene	Acetylene							
N-Butane	Alpha Pinene							
N-Hexane	Benzaldehydeb							
N-Pentane	Beta Pinene							
O-Ethyltoluene	Cis-2-Pentene							
O-Xylene	Carbon Tetrachloride							
P-Ethyltoluene	Cyclohexane							
Propane	Cyclopentane							
Propylene	Ethanol							
Styrene	Isopropylbenzene							
Toluene	M-Diethylbenzene							
Trans-2-Butene	Methylcyclohexane							
	Methylcyclopentane							
	N-Decane							
	N-Heptane							
	N-Nonane							
	N-Octane							
	N-Propylbenzene							
	N-Undecane							
	P-Diethylbenzene							
	Tetrachloroethylene							
	Trans-2-Pentene							

^a This table only includes individual target compounds. Monitoring agencies should continue measuring and reporting total non-methane organic compounds (TNMOC)

organic compounds (TNMOC)

b These compounds are carbonyls and are measured using Method TO-

9.2.4 Hourly Averaged Nitrogen Oxide (NO), True Nitrogen Dioxide (NO₂) and Total Reactive Nitrogen (NO_y)

NO and NO_y are already measured at Blair Street as a part of the NCore requirements and will continue. True NO₂ is currently measured at Blair Street using an analyzer with a photolytic NO₂ converter. This instrument will be replaced with a cavity attenuated phase shift spectroscopy (CAPS) NO/NO₂/NOx analyzer designated as FEM that will provide true NO₂ measurement as well as NO and NOx.

9.2.5-9.2.10 Hourly Averaged Ambient Temperature, Hourly Vector-Averaged Wind Direction, Hourly Vector-Averaged Wind Speed, Hourly Averaged Atmospheric Pressure, Hourly Averaged Relative Humidity, And Hourly Precipitation

Temperature, wind direction, wind speed, atmospheric pressure, and relative humidity are already measured at Blair Street and will continue. The Department will procure, install and use a precipitation measurement instrument.

9.2.11 Hourly Averaged Mixing Height

EPA plans to provide funding for procurement of a ceilometer, which is an instrument that uses a laser to measure mixing height. Based on information available at this time, the Department expects that the ceilometer to be procured, installed, and used will be a Vaisala CL-51 with appropriate software. The mixing height measurement is expected to begin in June 2021 if funds are available.

9.2.12 Hourly Averaged Solar Radiation

Solar radiation is already measured at Blair Street and will continue.

9.2.13 Hourly Averaged Ultraviolet Radiation

The Department will procure, install and use an ultraviolet radiation measurement instrument.

9.3 PAMS Implementation Schedule and Resource Requirements

The following table lists some of the major schedule elements associated with implementation of PAMS measurement and tentative starting and ending dates (month and year) for each activity. It is based on the QAIP referenced above and associated information from EPA, including information provided during regular PAMS conference calls, and includes relevant activities planned by EPA. As noted in the table, timing of some of the schedule elements, especially capital equipment acquisition, depends on availability of funding and availability of instrumentation from national contracts. This schedule reflects the delays described above and is subject to additional change as the progress of elements in the schedule continues to evolve.

Personnel resource and cost estimates for this activity are being developed by the Department and will be communicated separately to EPA Region 7 staff.

Tentative PAMS Implementation Schedule

	Start	Finish					
QA Related Tasks							
EPA: PAMS TAD and Auto GC SOPs and workgroup review/iteration/comment	2/17	5/19					
EPA : PAMS generic QAPP and SOPs (NO2, ceilometer, carbonyl sampling/analysis)	7/17	5/19					
and review/iteration/comment							
EPA: PAMS proficiency testing (PT) and TSA program development and	11/17	7/19					
review/iteration/comment							
EPA: Development of quality control/PT reports	4/18	9/19					
Department Duet DAMC OADD and CODe	12/17	12/20					
Department: Draft PAMS QAPP and SOPs	12/17	12/20					
EPA (Region VII): Review QAPP and SOPs	12/20	3/21					
Department : Finalize QAPP and SOPs	3/21	5/21					
	40/40	2/24					
EPA: TSA audit training/readiness reviews	10/18	3/21					
EPA: Proficiency testing on operational sites/labs	10/18	5/21					
Implementation Tasks							
Department: Implementation plan development (this plan)	1/17	6/20					
Department : Personnel resource and cost estimate planning and development	1/17	12/20					
Department : Continue to participate in monthly PAMS conference calls and	1/17	5/21					
review guidance documents as available							
EPA and Department : Capital equipment acquisition from national contract (GC;	11/17	12/20					
depends on EPA schedule)							
Department : Other equipment and supplies acquisition (depends on funding	7/19	4/21					
availability)							
Department: Equipment installation	1/21	4/21					
Department: Equipment shakedown/testing	4/21	5/21					
Department : First PAMS measurement season	6/21	8/21					

Network Description/Components

See Appendix 1 for the Network Description, which includes the following components:

Site Data

All ambient air monitoring sites are recorded in the EPA's Air Quality System (AQS) database. Site data include:

AQS Site Code

The site code includes a numerical designation for state, county and individual site. The state and county codes are assigned a number based on the alphabetical order of the state or county. Site numbers are assigned sequentially by date established in most counties. St. Louis County sites also have a division for municipality within St. Louis County.

Street Address

The official post office address of the lot where the monitors are located. Because not all sites are located in cities or towns, the street address is occasionally given as the intersection of the nearest streets or highways.

Geographical Coordinates

The coordinate system used by the Department is latitude and longitude.

Air Quality Control Region

Air Quality Control Regions (AQCR) are defined by EPA and designate either urban regions, like St. Louis or Kansas City, or rural sections of a state, such as northeast or southwest Missouri.

AQCR	AQCR Name
070	Metropolitan St. Louis
094	Metropolitan Kansas City
137	Northern Missouri
138	Southeast Missouri
139	Southwest Missouri

Core Based Statistical Area

Core Based Statistical Areas (CBSA) are defined by the U.S. Census Bureau.

CBSA Code	CBSA Name
00000	Not in a CBSA
16020	Cape Girardeau-Jackson, Missouri-Illinois
17860	Columbia, Missouri
22220	Fayetteville-Springdale-Rogers, Arkansas-Missouri
27620	Jefferson City, Missouri
27900	Joplin, Missouri
28140	Kansas City, Missouri-Kansas
41140	St. Joseph, Missouri-Kansas

41180	St. Louis, Missouri-Illinois
44180	Springfield, Missouri

Monitor Data

Each monitor is designed to detect a specific chemical pollutant or group of related pollutants. A site may have one or many monitors and not all sites will have the same monitors. Monitor data include:

Pollutant

The common name of the pollutant. Criteria pollutants are defined by statute in the Clean Air Act.

AQS Pollutant Code

Each pollutant has a unique numerical code. PAMS pollutant codes are listed in the PAMS QAPP template and will be listed in the PAMS QAPP (see Section 9).

Pollutant Code	Pollutant
14129	Lead – Local Conditions (LC)
42101	Carbon Monoxide
42401	Sulfur Dioxide
42406	Sulfur Dioxide 5-minute
42600	Reactive Oxides of N (NOY)
42601	Nitric Oxide
42602	Nitrogen Dioxide
42603	Oxides of Nitrogen
44201	Ozone
61103	Resultant Wind Speed
61104	Resultant Wind Direct
62101	Outdoor Temperature
62107	Indoor Temperature
62201	Relative Humidity
63301	Solar Radiation
64101	Barometric Pressure
68105	Average Ambient Temperature
68108	Sample Barometric Pressure
81102	PM_{10}
88313	Black Carbon-LC
85101	$PM_{10} - LC$
85129	Lead PM10 LC - FRM/FEM
86101	PMCoarse – LC (FRM Difference)
88101	$PM_{2.5}$ FRM
88500	PM _{2.5} Total Atmospheric
88502	PM _{2.5} AQI/Speciation
88503	PM _{2.5} Reference
61106	Sigma Theta
62106	Temperature Difference

65102	Precipitation
88314	UV Carbon PM _{2.5} -Local Condition
85102	Antimony
85103	Arsenic PM ₁₀ LC
85107	Barium PM ₁₀ LC
85109	Bromine PM ₁₀ LC
85110	Cadmium PM ₁₀ LC
85111	Calcium PM ₁₀ LC
85112	Chromium PM ₁₀ LC
85113	Cobalt PM ₁₀ LC
85114	Copper PM ₁₀ LC
85126	Iron PM ₁₀ LC
85128	Lead PM ₁₀ LC
85132	Manganese PM ₁₀ LC
85136	Nickel PM ₁₀ LC
85142	Mercury PM ₁₀ LC
85154	Selenium PM ₁₀ LC
85160	Tin PM ₁₀ LC
85161	Titanium PM ₁₀ LC
85164	Vanadium PM ₁₀ LC
85166	Silver PM ₁₀ LC
85167	Zinc PM ₁₀ LC
85173	Thallium PM ₁₀ LC
85180	Potassium PM ₁₀ LC
88160	Tin PM ₁₀ LC
	Organic Carbon Chemical Speciation Network Unadjusted
88305	PM _{2.5} LC TOT
88312	Total Carbon PM _{2.5} LC TOT
88316	Optical Elemental Carbon PM _{2.5} LC TOT

Parameter Occurrence Code

The Parameter Occurrence Code (POC) distinguishes between different monitors for the same pollutant, most often collocated monitors used for precision and quality assurance. For PM_{2.5}, different parameter occurrence codes are assigned to FRM, collocated FRM, continuous and speciation monitors.

Collocated

Collocated monitors are used for precision and quality assurance activities, and for redundancy for critical pollutants such as ozone.

Sampling Frequency

Sampling frequency varies for each pollutant, depending on the nature of the NAAQS standard and the technology used in the monitoring method. Most gaseous pollutants, $PM_{2.5}$ and PM_{10} monitors use continuous monitoring FEM methods and are averaged over one hour. Some particulate pollutants are filter-based FRM methods and averaged over one day.

Scale of Representation

Each monitor is intended to represent an area with similar pollutant concentration. The scales range from only a few meters to many kilometers.

- MIC Microscale defines the concentration in air volumes associated with area dimensions ranging from several meters up to about 100 meters.
- MID Middle defines the concentration typical of areas up to several city blocks in size with dimensions ranging from about 100 meters to 0.5 kilometers.
- **NBR Neighborhood** defines concentrations within an extended area of a city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometers.
- **URB Urban** defines an overall citywide condition with dimensions on the order of 4 to 50 kilometers.
- **REG** Regional defines air quality levels over areas having dimensions of 50 to hundreds of kilometers.

Monitor Type/Network Affiliation

The monitor's administrative classification is determined by the purpose for the monitor in the agency sampling strategy. Assignment of monitor types "NCORE" and "PAMS" is limited to EPA headquarters and is done only after a complete review and approval for all site or monitor metadata.

Code	Description
IMPROVE	IMPROVE or IMPROVE Protocol
INDEX SITE	(not currently used by Missouri)
INDUSTRIAL	Used to indicate sites operated by an industry
	Primary Quality Assurance Organization (PQAO)
NATTS	National Air Toxics Trends Station
NEAR ROAD	Near Road monitoring station
NCORE	National Core monitoring station
NON-EPA FEDERAL	(not currently used by Missouri)
NON-REGULATORY	Not used for NAAQS Compliance
PAMS	Photochemical Assessment Monitoring Stations
PROPOSED NCORE	Proposed NCore
QA COLLOCATED	Collocated to Satisfy 40 CFR 58 Appendix A
SLAMS	State or Local Air Monitoring Station
SPECIAL PURPOSE	Special Purpose Monitoring Station (SPM or
	SPMS)
SUPLMNTL SPECIATION	Supplemental Speciation
TRENDS SPECIATION	Trends Speciation
TRIBAL MONITORS	(not currently used by Missouri)
UNOFFICIAL PAMS	(not currently used by Missouri)

State Monitoring Objective

Each monitor has a distinct objective such as providing real-time data for public awareness or use in determining compliance with regulations. The state monitoring objective provides more information about the purpose of the monitoring in addition to the monitor objective required of 40 CFR 58.10(a)(6).

State Objective Code	Objective
AQI	Public Information
COM	NAAQS Compliance
MET	Meteorological Data
RES	Research
SIP	State Implementation Plan
SPP	Special Purpose Project
STA	State Standard

Units

The physical terms used to quantify the pollutant concentration, such as parts per million or micrograms per cubic meter.

Unit Code	Unit Description
001	$\mu g/m^3$
007	parts per million
008	parts per billion
011	meters per second
012	miles per hour
013	knots
014	degree, compass
015	degree Fahrenheit
016	millibars
017	degree Celsius
018	Langleys
019	percent humidity
021	inches
022	inches Mercury
025	Langleys per minute
059	Millimeter (Mercury)
073	Liters/minute STP-Flow
077	Micrograms
079	Watts/m ²
083	Cubic meter/minute
105	μg/m³ LC
106	Minutes
107	Percent
118	Liters/minute LC-Flow
119	Cubic meters/minute LC-Flow
121	parts per trillion

Monitoring/Analytical Method

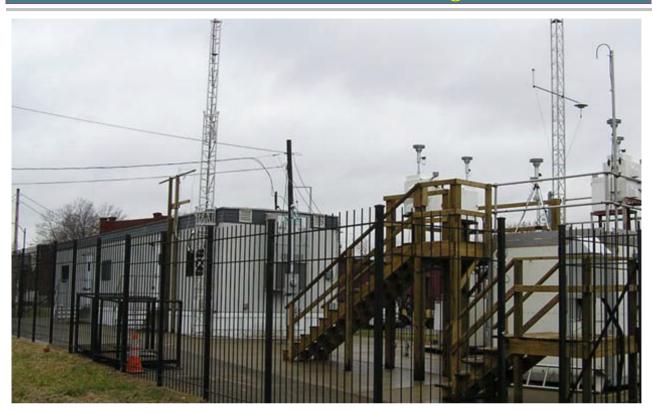
Each monitor relies on a scientific principle to determine the pollutant concentration, which is described by the sampling method. Each method code is specific for a particular pollutant; therefore a three numeral code may be used for different methods for different pollutants. This is required by 40 CFR 58.10(a)(3).

Monitoring Objective

This is the primary monitoring objective(s) for the monitoring parameter required by 40 CFR 58.10(a)(6). The monitoring objective is specific to the pollutant. Some sites may have more than one monitoring objective, but the primary objective is listed first.

Appendix 1: Missouri Monitoring Network Description							

Missouri Ambient Air Monitoring Network



MIC Microscale Several meters up to about 100 meters

MID Middle 100 meters to 0.5 kilometer NBR Neighborhood 0.5 to 4.0 kilometers range

URB Urban 4 to 50 kilometers

REG Regional Tens to hundreds of kilometers

COM National Ambient Air Quality Standards (NAAQS) Compliance

MET Meteorological Data N/A Not Applicable

NCore National Multi-Pollutant Monitoring Stations

NON-A Non-Ambient Site NON-R Non-Regulatory

PQAO Primary Quality Assurance Organization

RES Research

SLAMS State and Local Monitoring Stations

SIP State Implementation Plan

SPEC Speciation STA State Standard

SPM Special Purpose Monitoring SPP Special Purpose Project

Coll Collocated monitor. A secondary monitor at a site.

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Ameren Missouri (PQAO - 1440)

Labadie "F	Plant" Site	2							AQ	S Site Nu	<i>mber</i> 29-071	-9003
~1.5 km south of the Labadie Energy Center, Labadie, MO 63055												
Latitude:	38.5486	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude:	-90.83725	MSA:	7040	St. L	ouis, MO-	-IL						
Elevation (ft):	680	AQS						4.00		4.00		4.05
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
Std Dev Hz Wind	Direction 61106	Industrial	1		1	N/A	MET	014	deg	127	Scintec MFAS Sodar/RASS Acoustic Sounde	Other (40m - 300m) er
Temperature Virtu	al 62102	Industrial	1		1	N/A	MET	017	deg C	128	Scintec MFAS Sodar/RASS Radar Profiler	Other (40m - 300m)
Wind Direction - R	esultant 61104	Industrial	1		1	N/A	MET	014	deg	127	Scintec MFAS Sodar/RASS Acoustic Sounde	Other (40m - 300m)
Wind Speed - Res	sultant 61103	Industrial	1		1	N/A	MET	011	m/s	127	Scintec MFAS Sodar/RASS Acoustic Sounde	Other (40m - 300m) er
WS - Sigma Theta (Vertical)	a 61110	Industrial	1		1	N/A	MET	011	m/s	127	Scintec MFAS Sodar/RASS Acoustic Sounde	Other (40m - 300m)

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Relative Humidity	62201	Industrial	1	1	N/A	MET	019	%humidity	061	Met One 083D	Other
Std Dev Hz Wind Direction	61106	Industrial	1	1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (10m Tower)
Std Dev Vt Wind Direction	61107	Industrial	1	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
Sulfur Dioxide	42401	Industrial	1	н	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Sulfur Dioxide Max 5-min Avg	42406	Industrial	1	1	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Wind Direction - Resultant	61104	Industrial	1	1	N/A	MET	014	deg	020	Vector Summation	Other (10m Tower)
Wind Direction - Scalar	61102	Industrial	1	1	N/A	MET	014	deg	063	Climatronics	Other (10m Tower)
Wind Speed - Resultant	61103	Industrial	1	1	N/A	MET	011	m/s	020	Vector Summation	Other (10m Tower)
Wind Speed - Scalar	61101	Industrial	1	1	N/A	MET	011	m/s	063	Climatronics	Other (10m Tower)

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Wind Speed - Vertical	61109	Industrial	1		1	N/A	MET	011	m/s	020	Electronic Averaging	Other (10m Tower)
WS - Sigma Theta (Vertical)	61110	Industrial	1		1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (10m Tower)
Labadie, Soui	thwest								AQ	S Site Nu	mber 29-07 1	-9002
870 Albertina La	ne, Labad	die, MO 63	3055									
Latitude: 38	.52825	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude: -90	0.86301	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft): 63	0 <i>AQS</i>	AQS Monitor	AQS		AQS	AQS	State-	AQS Unit-	AQS	AQS Method	AQS	AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Sulfur Dioxide	42401	Industrial	1		н	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Sulfur Dioxide Max 5-n Avg	nin 42406	Industrial	1		1	MID	COM	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
T P . M. H.	Ot								4.0	a au M	mber29-071	0001
<u>Labadie, Vall</u> 2901 Labadie Bo	<u> </u>	d Labadie	MO	6305	5				AQ	S Site Nu	mber29-07	-9001
	.572522	AQCR:	070		opolitan S	t. Louis						
	0.796911	MSA:	7040		ouis, MO-							
Elevation (ft): 52												
Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Barometric Pressure	64101	Industrial	1		1	N/A	MET	016	Millbars	015	Instrumental- Barometric Press Transducer	Other S

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Outdoor Temperature	62101	Industrial	2	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (10m Probe Height)
Outdoor Temperature	62101	Industrial	3	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (2m Probe Height)
Outdoor Temperature Diff	62106	Industrial	1	1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other (10m - 2m Probe Heights)
Precipitation	65102	Industrial	1	1	N/A	MET	021	inches	014	Heated Tipping Bucket	Other
Relative Humidity	62201	Industrial	1	1	N/A	MET	019	%humidity	061	Met One 083D	Other
Solar Radiation	63301	Industrial	1	1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	n 61106	Industrial	1	1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (10m Tower)
Std Dev Vt Wind Direction	61107	Industrial	1	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
Sulfur Dioxide	42401	Industrial	1	Н	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented

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Sulfur Dioxide Max 5-min Avg	42406	Industrial	1		1	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Wind Direction - Resultant	61104	Industrial	1		1	N/A	MET	014	deg	020	Vector Summation	Other (10m Tower)
Wind Direction - Scalar	61102	Industrial	1		1	N/A	MET	014	deg	063	Climatronics	Other (10m Tower)
Wind Speed - Resultant	61103	Industrial	1		1	N/A	MET	011	m/s	020	Vector Summation	Other (10m Tower)
Wind Speed - Scalar	61101	Industrial	1		1	N/A	MET	011	m/s	063	Climatronics	Other (10m Tower)
Wind Speed - Vertical	61109	Industrial	1		1	N/A	MET	011	m/s	020	Electronic Averaging	Other (10m Tower)
WS - Sigma Theta (Vertical)	61110	Industrial	1		1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (10m Tower)
Rush Island, Fu	ılts-Si	te, IL							AQ	S Site Nu	mber17-133	-9001
Off Ivy Road, Fults	, IL 622	244										
Latitude: 38.159	908	AQCR:	138	SE Mi								
Longitude: -90.22	2728	MSA:	0000	Not in	a MSA							
	AQS Code	AQS Monitor Type	AQS POC		AQS Freq	AQS Scale		AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective

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Barometric Pressure	64101	Industrial	1	1	N/A	MET	016	Millbars	015	Instrumental- Barometric Press Transducer	Other
Outdoor Temperature	62101	Industrial	2	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (10m Probe Height)
Outdoor Temperature	62101	Industrial	3	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (2m Probe Height)
Outdoor Temperature Diff	62106	Industrial	1	1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other (10m - 2m Probe Heights)
Precipitation	65102	Industrial	1	1	N/A	MET	021	inches	014	Heated Tipping Bucket	Other
Relative Humidity	62201	Industrial	1	1	N/A	MET	019	%humidity	061	Met One 083D	Other
Solar Radiation	63301	Industrial	1	1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	n 61106	Industrial	1	1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (10m Tower)
Std Dev Vt Wind Direction	61107	Industrial	1	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)

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Sulfur Dioxide	42401	Industrial	1	Н	MID	COM	800	ppb	100	Ultra-violet Fluorescence	Source Oriented
Sulfur Dioxide Max 5-min Avg	42406	Industrial	1	1	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Wind Direction - Resultant	61104	Industrial	1	1	N/A	MET	014	deg	020	Vector Summation	Other (10m Tower)
Wind Direction - Scalar	61102	Industrial	1	1	N/A	MET	014	deg	063	Climatronics	Other (10m Tower)
Wind Speed - Resultant	61103	Industrial	1	1	N/A	MET	011	m/s	020	Vector Summation	Other (10m Tower)
Wind Speed - Scalar	61101	Industrial	1	1	N/A	MET	011	m/s	063	Climatronics	Other (10m Tower)
Wind Speed - Vertical	61109	Industrial	1	1	N/A	MET	011	m/s	020	Electronic Averaging	Other (10m Tower)
WS - Sigma Theta (Vertical)	61110	Industrial	1	1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (10m Tower)

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600 Johnson	Rd., Festus.	MO 63028								5 Sue Iva		
Latitude:	38.11999	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.28214	MSA:	7040	St. L	ouis, MO-	IL						
Elevation (ft):	656											
Lievation (j.).	AQS	AQS Monitor	AQS		AQS	AOS	State-	AQS Unit-	AQS	AQS Method	AQS	AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale		Code	_	Code	Method	Objective
Outdoor Temperat	ure 62101	Industrial	2		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (62.5m Probe Height)
Outdoor Temperat	ure 62101	Industrial	3		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (132.5m
											Averaging	Probe Height)
Outdoor Temperat	ure Diff 62106	Industrial	1		1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other (132.5m- 62.5m Probe
Std Dev Hz Wind I	Direction 61106	Industrial	1		1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Heights) Other (132.5m, 15 min)
Std Dev Hz Wind I	Direction 61106	Industrial	2		1	N/A	MET	014	deg	063	Arithmetic	Other
Std Dev 112 Willia I	Sirection of 100	muusma	۷		,	N/A	IVIL I	014	ueg	003	Standard Deviation	(132.5m, 60 min)
Std Dev Hz Wind I	Direction 61106	Industrial	3		1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (62.5m, A-15 min)
Std Dev Hz Wind I	Direction 61106	Industrial	4		1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (62.5m, A-60 min)
Std Dev Hz Wind I	Direction 61106	Industrial	5		1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (62.5m, B-15 min)

Std Dev Hz Wind Direction	61106	Industrial	6	1	N/A	MET	014	deg	063	Arithmetic Standard Deviation	Other (62.5m, B-60 min)
Std Dev Vt Wind Direction	61107	Industrial	1	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (132.5m, 15 min)
Std Dev Vt Wind Direction	61107	Industrial	2	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (132.5m, 60min)
Std Dev Vt Wind Direction	61107	Industrial	3	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (62.5m, A-15 min)
Std Dev Vt Wind Direction	61107	Industrial	4	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (62.5m, A-60min)
Std Dev Vt Wind Direction	61107	Industrial	5	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (62.5m, B-15 min)
Std Dev Vt Wind Direction	61107	Industrial	6	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (62.5m, B-60 min)
Wind Direction - Resultant	61104	Industrial	1	1	N/A	MET	014	deg	020	Vector Summation	Other (132.5m Probe Height)
Wind Direction - Resultant	61104	Industrial	2	1	N/A	MET	014	deg	020	Vector Summation	Other (62.5m Probe Height)
Wind Direction - Resultant	61104	Industrial	3	1	N/A	MET	014	deg	020	Vector Summation	Other (62.5m Probe Height)

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Wind Direction - Scalar	61102	Industrial	1	1	N/A	MET	014	deg	063	Climatronics	Other (132.5m Probe Height)
Wind Direction - Scalar	61102	Industrial	2	1	N/A	MET	014	deg	063	Climatronics	Other (62.5m Probe Height)
Wind Direction - Scalar	61102	Industrial	3	1	N/A	MET	014	deg	063	Climatronics	Other (62.5m Probe Height)
Wind Speed - Resultant	61103	Industrial	1	1	N/A	MET	011	m/s	020	Vector Summation	Other (132.5m Probe Height)
Wind Speed - Resultant	61103	Industrial	2	1	N/A	MET	011	m/s	020	Vector Summation	Other (62.5m Probe Height)
Wind Speed - Resultant	61103	Industrial	3	1	N/A	MET	011	m/s	020	Vector Summation	Other (62.5m Probe Height)
Wind Speed - Scalar	61101	Industrial	1	1	N/A	MET	011	m/s	063	Climatronics	Other (132.5m Probe Height)
Wind Speed - Scalar	61101	Industrial	2	1	N/A	MET	011	m/s	063	Climatronics	Other (62.5m Probe Height)
Wind Speed - Scalar	61101	Industrial	3	1	N/A	MET	011	m/s	063	Climatronics	Other (62.5m Probe Height)
Wind Speed - Vertical	61109	Industrial	1	1	N/A	MET	011	m/s	020	Electronic Averaging	Other (132.5m Probe Height)

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Wind Speed - Vertica	al 61109	Industrial	2		1	N/A	MET	011	m/s	020	Electronic Averaging	Other (62.5m Probe Height)
Wind Speed - Vertica	al 61109	Industrial	3		1	N/A	MET	011	m/s	020	Electronic Averaging	Other (62.5m Probe Height)
WS - Sigma Theta (Vertical)	61110	Industrial	1		1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (132.5m Probe Height)
WS - Sigma Theta (Vertical)	61110	Industrial	2		1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (62.5m Probe Height)
WS - Sigma Theta (Vertical)	61110	Industrial	3		1	N/A	MET	011	m/s	020	Arithmetic Standard Deviation	Other (62.5m Probe Height)
Rush Island,	Natche.	7.							AQ	S Site Nu	mber29-09!	9-9009
Rush Island 917 Natchez Tr		<u> </u>	le, M0	O 636	27				AQ	S Site Nu	mber 29-09 !	9-9009
917 Natchez Tr		<u> </u>	le, M (27 opolitan S	St. Louis			AQ	S Site Nu	mber 29-09 !	9-9009
917 Natchez Tr	ace Drive,	Bloomsda		Metro					AQ	S Site Nu	mber 29-09 9	9-9009
917 Natchez Tr Latitude: : Longitude: -	race Drive, 38.10525	Bloomsda AQCR: MSA:	070	Metro	opolitan S			408	AQ		mber 29-09 9	
917 Natchez Tr Latitude: : Longitude: -	race Drive, 38.10525 90.29842	Bloomsda	070	Metro	opolitan S	-IL	State- Obj	AQS Unit- Code		AQS Method Code		9-9009 AQS Monitor Objective
917 Natchez Tr Latitude: Longitude: Elevation (ft): Station (ft): Sta	race Drive, 38.10525 90.29842 505 AQS	Bloomsda AQCR: MSA: AQS Monitor	0707040AQS	Metro	opolitan S $_{ m outs}$, MO $_{ m outs}$	-IL AQS		Unit-	AQS	AQS Method	AQS	AQS Monitor

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Rush Island, Weaver Road & Highway AA

802 Weaver F	Road, Festus	, MO 6302	8									
Latitude:	38.144972	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude:	-90.304783	MSA:	7040	St. Lo	ouis, MO-	-IL						
Elevation (ft):	502	AQS						AQS		AQS		AQS
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale		Unit- Code	~	Method Code	AQS Method	Monitor Objective
Sulfur Dioxide	42401	Industrial	1		Н	MID	СОМ	008	ppb	100	Ultra-violet Fluorescence	Source Oriented
Sulfur Dioxide Max Avg	5-min 42406	Industrial	1		1	MID	СОМ	800	ppb	100	Ultra-violet Fluorescence	Source Oriented

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Doe Run Buick (PQAO - 1288) (Combining all Doe Run to 1290)

County Roc	ıd 75								AQS	S Site Nu	mber 29-093	-9010
98 Iron Count	y Road, Bix	by, MO 65	439									
Latitude:	37.64876	AQCR:	138	SE M	lissouri							
Longitude:	-91.14980	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	1365 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State-	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor
1 arameter	Code	1370	roc	Con	rreq	Scare	Obj	Coae	Onu	Coae	Meinoa	Objective
Sulfur Dioxide	42401	Industrial	1		н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max Avg	5-min 42406	Industrial	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Doe Run Bi	uick - Bui	ick NE							AQS	S Site Nu	mber 29-09 3	-9008
346 Power La	ne, Bixby W	est, MO 6	5439									
Latitude:	37.65214	AQCR:	138	SE M	lissouri							
Longitude:	-91.11689	MSA:	0000	Not i	n a MSA							
Elevation (ft):	1423 <i>AQS</i>	AQS Monitor	AQS		AQS	408	State-	AQS Unit-		AQS Method	AQS	AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale Scale		Code	Unit Unit	Code	Method	Objective
Lead (TSP) - LC FF	RM/FEM 14129	Industrial	1		1/1	MID	СОМ	105	ug/m^3-L(C 192	Inductive Coupled Plasma Spectrometry	Source Oriented

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Doe Run Bi	uick - No	rth #5 (1	VON	(-A)					AQ	S Site Nu	mber 29-09 3	3-0021
Doe Run Buic	ck - North#5	, Buick, M	O 654	139								
Latitude:	37.65178	AQCR:	138	SE M	lissouri							
Longitude:	-91.13094	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	1443 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC Fl	RM/FEM 14129	Industrial	1		1/6	MID	SIP	105	ug/m^3-L	C 192	Inductive Coupled Plasma Spectrometry	Source Oriented
Doe Run Bi	uick - Soi	uth #1 (1	VON	(-A)					AQ	S Site Nu	mber29-093	3-0016
Doe Run Buic	ck - South#1	, Buick, M	O 654	139								
Latitude:	37.62400	AQCR:	138	SE M	lissouri							
Longitude:	-91.12827	MSA:	0000	Not in	n a MSA							
Elevation (ft): Parameter	1502 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC FI	RM/FEM 14129	Industrial	1		1/6	MID	SIP	105	ug/m^3-Li	C 192	Inductive Coupled Plasma Spectrometry	Source Oriented
Lead (TSP) - LC FI	RM/FEM 14129	Industrial	2	✓	1/6	MID	SIP	105	ug/m^3-L	C 192	Inductive Coupled Plasma Spectrometry	Quality Assurance (Collocation)
Hwy 32 No	rtheast								AO.	S Site Nu	mber 29-09 3	3-9009
1582 Highway		MO 6543	9									
Latitude:	37.65319	AQCR:	138	SE M	lissouri							
Longitude:	-91.12795	MSA:	0000	Not in	n a MSA							
Elevation (ft):	1384	AQS						4.00		1.00		4.00
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective

Sulfur Dioxide	42401	Industrial	1		Н	MID	СОМ	800	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max 5- Avg	min 42406	Industrial	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
West Entrand	:e								AQ	S Site Nu	mber29-09	3-9011
18594 Hwy KK	Boss, M	O 65440										
Latitude: 3	7.63211	AQCR:	138	SE M	lissouri							
Longitude: -9	1.13565	MSA:	0000	Not in	n a MSA							
Elevation (ft): 1	163	AQS						AQS		AQS		AQS
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	Unit- Code	AQS Unit	Method Code	AQS Method	Monitor Objective
Sulfur Dioxide	42401	Industrial	1		Н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented

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Doe Run Glover (PQAO - 1289) (Combining all Doe Run to 1290)

Doe Run G	lover - Bi	g Creek	#5	(NO	V-A				AQ	S Site Nu	mber29-093	-0029
Doe Run Glov	ver - Big Cre	ek #5, Hw	y 49 (Glove	r, MO	65439						
Latitude:	37.47211	AQCR:	138	SE M	lissouri							
Longitude:	-90.68919	MSA:	0000	Not in	n a MSA							
Elevation (ft): Parameter	836 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC F	RM/FEM 14129	Industrial	1		1/6	MID	SIP	105	ug/m^3-L0	C 192	Inductive Coupled Plasma Spectrometry	Source Oriented
Doe Run G				(NC	ON-A er, MC	65439	9		AQ	S Site Nu	mber 29-0 93	-0027
Latitude:	37.48532	AQCR:	138	SE M	lissouri							
Longitude:												
	-90.68991	MSA:	0000	Not in	n a MSA							
Elevation (ft): Parameter		MSA: AQS Monitor Type	AQS	Not in	a MSA AQS Freq	AQS Scale		AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
•	AQS Code	AQS Monitor	AQS		AQS			Unit-	_	Method Code		Monitor Objective Source

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Spectrometry

(Collocation)

Doe Run Herculaneum (PQAO - 1290) (No Change)

Herculanev	ım, Chure	ch Stree	t (NO	ON-A	4)				AQS	S Site Nu	mber29-099	-0024
951 Church S	t., Herculane	eum, MO 6	53048									
Latitude:	38.258667	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.380889	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft):	463	AQS						4.00		4.O.C		4.0C
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC F	RM/FEM 14129	Industrial	1		1/6	NBR	СОМ	105	ug/m^3-LC	192	Inductive Coupled Plasma Spectrometry	Source Oriented
Herculanei	ım City I	Hall (Me	ott Si	reet					AQS	S Site Nu	mber29-099	-0020
360 Short Str									2."			
Latitude:	38.263394	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.379667	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft):	468 <i>AQS</i>	AQS Monitor	AQS		AQS		State-	AQS Unit-	~	AQS Method	~	AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Lead (TSP) - LC F	RM/FEM 14129	Industrial	1		1/1	MID	СОМ	105	ug/m^3-L(C 192	Inductive Coupled Plasma Spectrometry	Source Oriented & Highest Concentration
Lead (TSP) - LC F	RM/FEM 14129	Industrial	2	✓	1/3	MID	СОМ	105	ug/m^3-L0	192	Inductive Coupled Plasma Spectrometry	Quality Assurance (Collocation)

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Spectrometry

Population Exposure

Environmental Services Program (ESP) [PQAO - 0588]

Uba									AQS	S Site Nu	mber29-097	7-0004
20400 Millwo	od Rd., Alb	a, MO 648	30									
Latitude:	37.2385	AQCR:	139	SW N	Missouri							
Longitude:	-94.42468	MSA:	3710	Joplii	n, MO							
Elevation (ft): Parameter	965 AQS Code	AQS Monitor Type	AQS	Coll	AQS Freq	AQS Scale	State-	AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
1 arameter	Coae	1340	roc	Con	rreq	Scare	Ouj	Coae	Onu	Coae	Метноа	Objective
Indoor Temperatur	e 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Max Ozone Concentratio & Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
Arnold Wes		1 MO 620	10						AQS	S Site Nu	mber 29-09 9	9-0019
1709 Lonedel <i>Latitude:</i>	38.44862	ı, MO 650 <i>AQCR:</i>	070	Metro	opolitan S	St. Louis						
Longitude:	-90.3958	MSA:	7040		· ouis, MO-							
Elevation (ft): Parameter		AQS Monitor Type	AQS POC	Coll		AQS Scale		AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
Ammonium Ion PN	12.5 LC 88301	SLAMS	6		1/6	NBR	RES	105	ug/m^3-LC	C 812	Met One SASS Nylon	Population Exposure (UC-Davis)

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Barometric Pressure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
OP CSN_Rev Undj PM2.5 LC TOR	88378	SLAMS	6		1/6	NBR	RES	105	ug/m^3-LC	842	URG 3000N w/Pall Quartz filter & Cyclone Inlet	Population Exposure (UC-Davis)
Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
PM10 - STP FRM/FEM	81102	SLAMS	3		1	NBR	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Population Exposure
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
PM2.5 Volatile Channel	88503	SPM	4		1	NBR	AQI	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure

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Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Wind Direction - Resultan	t 61104	SPM	1		1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	067	Instrumental: RM Young Model 05103	Other (10m Tower)
Blair Street (80	5101-2	2 & 811	02-1	to l	oe dis	conti	nued)	AQS	Site Nu	mber29-510	-0085
3247 Blair Street, S	St. Loui	is, MO 631	107									
Latitude: 38.65	638	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude: -90.1	9825	MSA:	7040	St. Lo	ouis, MO	-IL						
	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale		AQS Unit- Code	AQS	AQS Method Code		AQS Monitor Objective
Ammonium Ion PM2.5 LC	88301	SPM	6		1/3	NBR	RES	105	ug/m^3-LC	812	Met One SASS Nylon	Highest Concentration (UC-Davis)
Barometric Pressure	64101	SLAMS	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Black Carbon PM2.5 LC	88313	SLAMS	1		1	NBR	RES	105	ug/m^3-LC	894	Magee Scientific TAPI M633 Aethalometer	Population Exposure
Carbon Monoxide	42101	NCORE	1		Н	NBR	COM	007	ppm	554	Gas Filter Corr Thermo Electron	Population

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Indoor Temperature	62107	SLAMS	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other (Large Shelter)
Indoor Temperature	62107	SLAMS	2		1	N/A	MET	017	deg C	013	Electronic Averaging	Other (Small Shelter)
Lead PM10 LC	85128	SPM	6		1/6	NBR	RES	108	ng/m^3-LC	907	R&P Partisol 2025 Teflon	Population Exposure (ERG)
Lead PM10 LC	85128	SPM	7	✓	1/6	NBR	RES	108	ng/m^3-LC	907	R&P Partisol 2025 Teflon	Population Exposure (ERG)
Nitric Oxide	42601	NCORE	1		н	NBR	СОМ	800	ppb	699	Teledyne API 200 EU/501	Population Exposure
Nitric Oxide	42601	SLAMS	2		Н	NBR	СОМ	800	ppb	200	Teledyne API T200UP Photolytic	Population Exposure
Nitrogen Dioxide	42602	SLAMS	2		Н	NBR	СОМ	800	ppb	200	Teledyne API T200UP Photolytic	Population Exposure
OP CSN_Rev Undj PM2.5 LC TOR	5 88378	SPM	6		1/3	NBR	RES	105	ug/m^3-LC	842	URG 3000N w/Pall Quartz filter & Cyclone Inlet	Highest Concentration (UC-Davis)
Outdoor Temperature	62101	NCORE	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Oxides of Nitrogen	42603	SLAMS	2		н	NBR	СОМ	008	ppb	200	Teledyne API T200UP Photolytic	Population Exposure

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Ozone	44201	NCORE	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	NCORE	2	•	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
PM10 - LC/FEM/NonFEM	85101	SLAMS	1		1/3	NBR	СОМ	105	ug/m^3-LC	127	Lo-Vol R&P 2025 Sequential	Population Exposure
PM10 - LC/FEM/NonFEM	85101	SLAMS	5		1	NBR	СОМ	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Population Exposure
PM10 - LC/FEM/NonFEM	85101	SPM	6		Н	NBR	СОМ	105	ug/m^3-LC	239	Teledyne API T640x	Population Exposure
PM10 - LC/FEM/NonFEM	85101	SPM	7	•	Н	NBR	СОМ	105	ug/m^3-LC	239	Teledyne API T640x	Population Exposure
PM10 - STP FRM/FEM	81102	SLAMS	1		1/3	NBR	СОМ	001	ug/m^3	127	Lo-Vol R&P 2025 Sequential	Population Exposure
PM10 - STP FRM/FEM	81102	SPM	6		Н	NBR	СОМ	001	ug/m^3	239	Teledyne API T640x	Population Exposure
PM10 - STP FRM/FEM	81102	SPM	7	•	Н	NBR	СОМ	001	ug/m^3	239	Teledyne API T640x	Population Exposure
PM2.5 - LC FRM/FEM	88101	NCORE	2		1/3	NBR	СОМ	105	ug/m^3-LC	145	R&P 2025 Sequential w/VSCC	Quality Assurance (Collocation)

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PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405- DF	Population Exposure
PM2.5 - LC FRM/FEM	88101	SPM	6		Н	NBR	СОМ	105	ug/m^3-LC	238	Teledyne API T640x	Population Exposure
PM2.5 - LC FRM/FEM	88101	SPM	7	•	Н	NBR	COM	105	ug/m^3-LC	238	Teledyne API T640x	Population Exposure
PM2.5 Tot Atmospheric	88500	SLAMS	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Population Exposure
PM2.5 Volatile Channel	88503	SLAMS	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Population Exposure
PMCoarse - LC FRM/FEN	/ 86101	SLAMS	2		1/3	NBR	СОМ	105	ug/m^3-LC	176	Thermo 2025 Sequential PM10- PM2.5	Population Exposure
PMCoarse - LC FRM/FEN	/I 86101	SPM	6		Н	NBR	СОМ	105	ug/m^3-LC	240	Teledyne API T640x	Population Exposure
PMCoarse - LC FRM/FEN	/ 86101	SPM	7	✓	Н	NBR	СОМ	105	ug/m^3-LC	240	Teledyne API T640x	Population Exposure
PMCoarse - LC FRM/FEM	/ 86101	SLAMS	8		1	NBR	СОМ	105	ug/m^3-LC	207	FMDS- Gravimetric 1405- DF	Population Exposure
Reactive Oxides of N (NOY)	42600	NCORE	1		Н	NBR	СОМ	800	ppb	699	Teledyne API 200 EU/501	Population Exposure

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Relative Humidity	62201	NCORE	1	1	N/A	MET	019	%humidity	014	Instrumental- Hygromer C94 Probe	Other
Solar Radiation	63301	SLAMS	1	1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	61106	SPM	1	1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
Sulfur Dioxide	42401	NCORE	1	Н	NBR	СОМ	008	ppb	560	Pulsed Flourescent 43i- TLE	Population Exposure
Sulfur Dioxide Max 5-min Avg	42406	NCORE	1	1	NBR	СОМ	008	ppb	560	Pulsed Fluorescent	Population Exposure
UV Carbon PM2.5 LC	88314	SLAMS	1	1	NBR	RES	105	ug/m^3-LC	894	Magee Scientific TAPI M633 Aethalometer	Population Exposure
Wind Direction - Resultant	61104	NCORE	1	1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	NCORE	1	1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)

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Dine Kinge.	<u>, [-/</u>	<u>' </u>								AQ_{k}	sue mu	mver29-093	UUTL
4018 Harvard	Lan	e, Kansa	as City, M	O 641	33								
Latitude:	39.0	47911	AQCR:	094	Metro	opolitan k	Kansas Ci	ty					
Longitude:	-94.4	150513	MSA:	3760	Kans	as City, N	MO-KS						
Elevation (ft): Parameter		AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code		AQS Method Code		AQS Monitor Objective
Barometric Pressu	ure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Black Carbon PM2	2.5 LC	88313	SPM	1		1	MIC	СОМ	105	ug/m^3-L(C 894	Magee Scientific TAPI M633 Aethalometer	Source Oriented
Carbon Monoxide		42101	SLAMS	1		Н	MIC	COM	007	ppm	554	Gas Filter Corr Thermo Electron 48i TLE	Source Oriented
Indoor Temperatur	re	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Nitric Oxide		42601	SPM	1		Н	MIC	COM	008	ppb	074	Chemiluminescer ce	n Source Oriented
Nitrogen Dioxide		42602	SLAMS	1		н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
Outdoor Temperat	ure	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)

Outdoor Temperature	62101	SPM	2	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (10m Probe Height)
Outdoor Temperature	62101	SPM	3	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (2m Probe Height)
Outdoor Temperature Diff	62106	SPM	1	1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other
Oxides of Nitrogen	42603	SPM	1	н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
PM10 - LC/FEM/NonFEM	85101	SPM	5	1	MIC	СОМ	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PM2.5 - LC FRM/FEM	88101	SLAMS	4	1	MIC	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405- DF	Source - Oriented
PM2.5 Tot Atmospheric	88500	SPM	1	1	MIC	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PM2.5 Volatile Channel	88503	SPM	1	1	MIC	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PMCoarse - LC FRM/FEM	86101	SLAMS	8	1	MIC	СОМ	105	ug/m^3-LC	207	FMDS- Gravimetric 1405- DF	Source - Oriented

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Precipitation	65102	SPM	1		1	N/A	MET	021	inches	014	Heated Tipping Bucket	Other
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Solar Radiation	63301	SPM	1		1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	61106	SPM	1		1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
UV Carbon PM2.5 LC	88314	SPM	1		1	MIC	СОМ	105	ug/m^3-LC	894	Magee Scientific TAPI M633 Aethalometer	Source Oriented
Wind Direction - Resultant	61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Bonne Terre									AQS	Site Nu	_{mber} 29-186	-0005
15797 Highway D,	Bonne 7	Terre, MO	6362	8								
Latitude: 37.900	084	AQCR:	138	SE Mis	ssouri							
Longitude: -90.42	388	MSA:	0000	Not in	a MSA							
Elevation (ft): 840		AQS						AQS	4	AQS		AQS
	AQS	Monitor Type	AQS POC		AQS Freq	AQS Scale			AQS	Method Code	AQS	Monitor Objective

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Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	REG	СОМ	007	ppm	047	Ultraviolet Photometric	Regional Transport
Ozone	44201	SLAMS	2	•	1	REG	COM	007	ppm	047	Ultraviolet Photometric	-
Solar Radiation	63301	SPM	1		1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Branch Street									AQ	S Site Nu	mber29-51	0-0093
100 Branch St., S	St. Louis,	MO 6310	2									
Latitude: 38	.65643	AQCR:	070	Metro	politan S	St. Louis						
Longitude: -90	0.18977	MSA:	7040	St. Lo	ouis, MO-	-IL						
Longitude: -90 Elevation (ft): 42 Parameter		MSA: AQS Monitor Type	7040 AQS POC		AQS Freq		State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Elevation (ft): 42	9 AQS	AQS Monitor	AQS		AQS	AQS		Unit-		Method		Monitor
Elevation (ft): 42 Parameter	9 AQS Code	AQS Monitor Type	AQS POC		AQS Freq	AQS Scale	Obj	Unit- Code	Unit	Method Code	Method Instrumental-Barometric	Monitor Objective

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PM10 - STP FRM/FEM	81102	SLAMS	3		1	MID	COM	001	ug/m^3	239	Teledyne API T640x	Source Oriented
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	MID	СОМ	105	ug/m^3-LC	C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Source Oriented
PM2.5 Volatile Channel	88503	SPM	4		1	MID	AQI	105	ug/m^3-LC	C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Source Oriented
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Std Dev Hz Wind Direction	61106	SPM	1		1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
Wind Direction - Resultant	61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Buick NE									AQS	Site Nu	mber 29-093	-0034
346 Power Lane, B	ixby We	st, MO 6	5439									
Latitude: 37.652	212	AQCR:	138	SE Mi	ssouri							
Longitude: -91.11	653	MSA:	0000	Not in	a MSA							
Elevation (ft): 1423	1	AQS						AQS		AQS		AQS
	AQS	Monitor Type	AQS POC		AQS Freq	AQS Scale		Unit- Code		Method Code	AQS	AQS Monitor <u>Objective</u>

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Parameter Parameter		.QS ode	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale		AQS Unit- Code	AQS	AQS Method Code	AQS	AQS Monitor Objective
Elevation (ft):	986	υ <u>ν</u>			•								
Lantuae: Longitude:	37.1982 -94.317		AQCR: MSA:	3710	Joplin								
530 Juniper, C <i>Latitude:</i>	_			139	SW M	1issouri							
Carthage	7 .4	3.50								AQS	Site Nu	mber 29-097	-0003
Wind Speed - Resu	ultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10 meters)
Wind Direction - Re	esultant	61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10 meters)
Sulfur Dioxide Max Avg	5-min	42406	SPM	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide		42401	SPM	1		н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Lead (TSP) - LC FF	RM/FEM	14129	SLAMS	2	✓	1/6	MID	COM	105	ug/m^3-LC	813	Inductively Coupled Plasma Mass Spectroscopy	Quality Assurance (Collocation)
Lead (TSP) - LC FF	RM/FEM	14129	SLAMS	1		1/6	MID	СОМ	105	ug/m^3-LC	813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented & Highest Concentration
Indoor Temperature	e	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other

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Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
PM10 - STP FRM/FEM	81102	SLAMS	3		1	MID	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Source Oriented
PM10 - STP FRM/FEM	81102	SLAMS	4	✓	1	MID	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Quality Assurance (Collocation)
Wind Direction - Resultar	nt 61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (5.5 meters)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (5.5 meters)
											00000	
El Dorado Spr	ings								AQS	S Site Nui		-0001
<i>El Dorado Spr</i> Highway 97 & Ba		ad, El Dor	ado S _I	prings,	MO 6	54744			AQS	S Site Nu	mber29-039	-0001
	rnes Roa	ad, El Dor	ado S _I	_	MO 6	54744			AQS	S Site Nu		-0001
Highway 97 & Bar Latitude: 37.76	rnes Roa		_	SW M		54744			AQS	S Site Nu		-0001
Highway 97 & Ba	rnes Roa 0097 03474 <i>AQS</i>	AQCR:	139 0000 <i>AQS</i>	SW M	issouri a MSA AQS	AQS	State- Obj		AQS	AQS Method	mber 29-039 AQS	AQS Monitor
Highway 97 & Bar Latitude: 37.76 Longitude: -94.0 Elevation (ft): 965	rnes Roa 0097 03474	AQCR: MSA: AQS Monitor	139 0000 <i>AQS</i>	SW M	issouri a MSA AQS			Unit-		AQS	mber 29-039 AQS	A Q S

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Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Ozone	44201	SLAMS	1		1	REG	СОМ	007	ppm	047	Ultraviolet Photometric	Regional Transport
			_		-							
Ozone	44201	SLAMS	2	•	1	REG	COM	007	ppm	047	Ultraviolet Photometric	-
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	REG	COM	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Regional Transport
PM2.5 Volatile Channel	88503	SPM	4		1	REG	AQI	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Regional Transport
Relative Humidity	62201	SPM	2		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Wind Direction - Resultant	t 61104	SPM	1		1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (5.5 meters)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	067	Instrumental: RM Young Model 05103	Other (5.5 meters)

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Farrar									AQ	S Site Nu	<i>mber</i> 29-15	7-0001
County Rd. 34	42, Farrar, M	IO 63746										
Latitude:	37.70264	AQCR:	138	SE M	lissouri							
Longitude:	-89.698640	MSA:	0000	Not in	n a MSA							
Elevation (ft):	497	AQS						405		4.0S		4.0S
	AQS	Monitor	AQS		AQS		State-	AQS Unit-	~	AQS Method		AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Indoor Temperatur	e 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic	Other
											Averaging	
Ozone	44201	SLAMS	1		1	NBR	COM	007	ppm	047	Ultraviolet Photometric	Max Ozone Concentration & Extreme
												Downwind
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	nnm	047	Ultraviolet	
Ozone	44201	SLAIVIS	2	V	'	NDK	COIVI	007	ppm	047	Photometric	-
Fellows La	ke								AQ	QS Site Nu	mber 29-07	7-0042
Fellows La 4208 E. Farm		ingfield, M	1O 658	803					AQ	QS Site Nu	mber 29-07	7-0042
		ingfield, M			Missouri				AQ	98 Site Nu	mber 29-07	7-0042
4208 E. Farm	Rd. 66, Spri			SW M	Missouri ogfield, M	0			AQ	<u>98 Site Nu</u>	<u>mber29-07</u>	7-0042
4208 E. Farm <i>Latitude:</i>	Rd. 66, Spri	AQCR: MSA:	139	SW M		0		4.05	AQ		mber 29-07	
4208 E. Farm Latitude: Longitude:	Rd. 66, Spri 37.31912 -93.20422 1346 <i>AQS</i>	AQCR: MSA: AQS Monitor	139 7920 <i>AQS</i>	SW N			State-	AQS Unit-		OS Site Nu AQS Method		AQS Monitor
4208 E. Farm Latitude: Longitude:	Rd. 66, Spri 37.31912 -93.20422 1346	AQCR: MSA: AQS	139 7920 <i>AQS</i>	SW M	igfield, M				AQS	AQS		AQS
4208 E. Farm Latitude: Longitude: Elevation (ft):	Rd. 66, Spri 37.31912 -93.20422 1346 <i>AQS</i>	AQCR: MSA: AQS Monitor	139 7920 <i>AQS</i>	SW N	igfield, M AQS	AQS		Unit-	AQS	AQS Method	AQS	AQS Monitor
4208 E. Farm Latitude: Longitude: Elevation (ft): Parameter	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor	139 7920 <i>AQS</i>	SW N	igfield, M AQS	AQS		Unit-	AQS Unit	AQS Method	AQS	AQS Monitor
4208 E. Farm Latitude: Longitude: Elevation (ft):	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor Type	139 7920 AQS POC	SW M	agfield, Mo	AQS Scale	Obj	Unit- Code	AQS	AQS Method Code	AQS Method	AQS Monitor Objective
4208 E. Farm Latitude: Longitude: Elevation (ft): Parameter	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor Type	139 7920 AQS POC	SW M	agfield, Mo	AQS Scale	Obj	Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
4208 E. Farm Latitude: Longitude: Elevation (ft): Parameter Indoor Temperature	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor Type SPM	139 7920 AQS POC	SW N Sprin	AQS Freq	AQS Scale	<i>Obj</i> MET	Unit-Code 017	AQS Unit	AQS Method Code	AQS Method Electronic Averaging	AQS Monitor Objective Other
4208 E. Farm Latitude: Longitude: Elevation (ft): Parameter	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor Type	139 7920 AQS POC	SW M	agfield, Mo	AQS Scale	Obj	Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective Other Max Ozone Concentration
4208 E. Farm Latitude: Longitude: Elevation (ft): Parameter Indoor Temperature	Rd. 66, Spri 37.31912 -93.20422 1346 AQS Code	AQCR: MSA: AQS Monitor Type SPM	139 7920 AQS POC	SW N Sprin	AQS Freq	AQS Scale	<i>Obj</i> MET	Unit-Code 017	AQS Unit	AQS Method Code	AQS Method Electronic Averaging	AQS Monitor Objective Other

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Finger Lak 1505 E. Peabo		olumbio N	10 65	202					AQS	Site Nu	mber 29-0 19	-0011
Latitude:	39.07803	AQCR:	137		nern Misso	ouri						
		MSA:	1740		mbia, MO							
Longitude:	-92.31632 726	MSA:	.,	Colu	noia, mo							
Elevation (ft): Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperature	e 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Max Ozone Concentration & Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
Hetcher Forest Rd. 223	36, Westfork	s, MO 644	98						AQS	S Site Nu	mber 29-17 9	-0002
Latitude:	37.46889	AQCR:	138	SE M	lissouri							
Longitude:	-91.08847	MSA:	0000	Not i	n a MSA							
Elevation (ft):	1256	AQS						4.000		4.OC		4.05
Parameter	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj		AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC Ff	RM/FEM 14129	SLAMS	1		1/6	NBR	СОМ	105	ug/m^3-LC	813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented

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Foley West									AQS	S Site Nu	mber29-113	3-0004
2100 Highway	y Y Foley, M	1O 63347										
Latitude:	39.04577	AQCR:	137	North	nern Miss	ouri						
Longitude:	-90.84927	MSA:	7040	St. L	ouis, MO-	IL						
Elevation (ft): Parameter	715 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperatur	re 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Extreme Downwind
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
Forest City	, Exide L	evee							AQS	S Site Nu	mber29-087	'-0008
25942 Hwy 1	11, Forest C	ity, MO 64	1451									
Latitude:	40.027222	AQCR:	137	North	nern Miss	ouri						
Longitude:	-95.235833	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	904 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq		State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC F	RM/FEM 14129	SLAMS	1		1/6	MID	СОМ	105	ug/m^3-LC	C 813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented

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rorest Pari	K									AQS	Sue Nui	mber 29- 310	-0034
5600 Clayton	Ave	nue, St.	Louis, MO	O 6311	0								
Latitude:	38.6	3114	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.2	28115	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft): Parameter	551	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS	AQS Method Code		AQS Monitor Objective
Barometric Presso	ure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Black Carbon PM2	2.5 LC	88313	SPM	1		1	MIC	СОМ	105	ug/m^3-LC	894	Magee Scientific TAPI M633 Aethalometer	Source Oriented
Carbon Monoxide		42101	SLAMS	1		н	MIC	СОМ	007	ppm	554	Gas Filter Corr Thermo Electron 48i TLE	Source Oriented
Indoor Temperatur	re	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Nitric Oxide		42601	SPM	1		н	MIC	COM	008	ppb	074	Chemiluminescer ce	n Source Oriented
Nitrogen Dioxide		42602	SLAMS	1		н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
Outdoor Temperat	ure	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)

Outdoor Temperature	62101	SPM	2	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (10m Probe Height)
Outdoor Temperature	62101	SPM	3	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (2m Probe Height)
Outdoor Temperature Diff	62106	SPM	1	1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other (10m - 2m Probe Height)
Oxides of Nitrogen	42603	SPM	1	Н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	Source Oriented
PM10 - LC/FEM/NonFEM	85101	SPM	5	1	MIC	СОМ	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PM2.5 - LC FRM/FEM	88101	SLAMS	4	1	MIC	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405- DF	Source - Oriented
PM2.5 Tot Atmospheric	88500	SPM	1	1	MIC	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PM2.5 Volatile Channel	88503	SPM	1	1	MIC	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Source - Oriented
PMCoarse - LC FRM/FEM	86101	SLAMS	8	1	MIC	СОМ	105	ug/m^3-LC	207	FMDS- Gravimetric 1405- DF	Source - Oriented

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Precipitation	65102	SPM	1		1	N/A	MET	021	inches	014	Heated Tipping Bucket	Other
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Solar Radiation	63301	SLAMS	1		1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	61106	SPM	1		1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
UV Carbon PM2.5 LC	88314	SPM	1		1	MIC	СОМ	105	ug/m^3-LC	894	Magee Scientific TAPI M633 Aethalometer	Source Oriented
Wind Direction - Resultant	61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Front Street									AQS	Site Nu	mber 29-0 95	-0018
1331 N. Jackson, K	ansas Ci	ty, MO 6	4120									
Latitude: 39.13	198	AQCR:	094	Metrop	olitan K	ansas Cit	у					
Longitude: -94.52	137	MSA:	3760	Kansas	s City, N	IO-KS						
Elevation (ft): 728		AQS						AQS		AQS		AQS
	-2-	Monitor Type	AQS POC		AQS Freq	AQS Scale		Unit- Code		Method Code		Monitor Objective

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Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
PM10 - STP FRM/F	EM 81102	SLAMS	3		1	NBR	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Highest Concentration & Population Exposure
Herculaneu	m, Dunk	lin Higl	i Sch	ool (Com	bined	()		AQS	Site Nu	mber29-099	-0005
1 Black Cat Dr	r., Herculan	eum, MO,	63048	3								
Latitude:	38.26703	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.37875	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft):	445 <i>AQS</i>	AQS Monitor	AQS		AQS	AQS	State-	AQS Unit-		AQS Method	AQS	AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Lead (TSP) - LC FR	:M/FEM 14129	SLAMS	1		1/6	NBR	СОМ	105	ug/m^3-LC	813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented
Herculaneu	m, Mott	Street							AQS	Site Nu	mber29-099	-0027
747 Mott St., I	Herculaneur	m, MO, 63	048									
Latitude:	38.263394	AQCR:	070	Metro	opolitan S	t. Louis						
Longitude:	-90.379667	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft): Parameter	468 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS	AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Lead (TSP) - LC FR	M/FEM 14129	SLAMS	1		1/1	MID	СОМ	105	ug/m^3-LC	813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented & Highest Concentration

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Lead (TSP) - LC FRM/FEM 14129	SLAMS	2	✓	1/3	MID	СОМ	105	ug/m^3-L(C 813	Inductively Coupled Plasma Mass Spectroscopy	Quality Assurance (Collocation)
Sulfur Dioxide 42401	SLAMS	1		Н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented & Highest Concentration
Sulfur Dioxide Max 5-min 42406 Avg	SPM	1		1	MID	СОМ	800	ppb	060	Pulsed Fluorescent	Source Oriented & Highest Concentration
Wind Direction - Resultant 61104	SPM	1		1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (5.5 meters)
Wind Speed - Resultant 61103	SPM	1		1	N/A	MET	012	mph	067	Instrumental: RM Young Model 05103	Other (5.5 meters)
Herculaneum, Shern	nan							AQS	S Site Nu	mber29-099	-0013
460 Sherman St., Hercula	neum, MC) , 6304	18								
Latitude: 38.27170	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude: -90.37658	MSA:	7040	St. L	ouis, MO	-IL						
Elevation (ft): 462	AQS						405		4.OS		100
AQS	Monitor	AQS				State-		AQS	AQS Method	AQS	AQS Monitor
Parameter Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Lead (TSP) - LC FRM/FEM 14129	SLAMS	1		1/6	NBR	СОМ	105	ug/m^3-LC	C 813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented

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1	<u>Hillcrest High</u>	<u>Schoc</u>	ol							AQ	S Site Nu	<u>mber29-077</u>	-0036
	3319 N. Grant, Spr	ingfield	l, MO 658	03									
	Latitude: 37.25	5607	AQCR:	139	SW N	Missouri							
	Longitude: -93.2	9970	MSA:	7920	Sprin	gfield, Mo)						
	Elevation (ft): 1321		AQS						AQS		AQS		AQS
		AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj		AQS Unit	Method Code	AQS	Monitor Objective
	Barometric Pressure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
	Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
	Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
	Ozone	44201	SLAMS	1		1	URB	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
	Ozone	44201	SLAMS	2	✓	1	URB	СОМ	007	ppm	047	Ultraviolet	-
	PM10 - LC/FEM/NonFEM	85101	SPM	5		1	NBR	СОМ	105	ug/m^3-L0	C 790	FDMS- Gravimetric 1405 DF	Population - Exposure
	PM10 - STP FRM/FEM	81102	SLAMS	3		1	NBR	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Population Exposure

PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-L0	C 182	FMDS- Gravimetric 1405- DF	Population - Exposure
PM2.5 Tot Atmospheric	88500	АРМ	1		Н	NBR	AQI	105	ug/m^3-L0	C 790	FDMS- Gravimetric 1405- DF	Population - Exposure
PM2.5 Tot Atmospheric	88500	SPM	1		1	NBR	AQI	105	ug/m^3-L0	C 790	FDMS- Gravimetric 1405- DF	Population Exposure
PM2.5 Volatile Channel	88503	SPM	1		1	NBR	AQI	105	ug/m^3-L0	C 790	FDMS- Gravimetric 1405- DF	Population Exposure
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	y 020	Instrumental- Computed (Indirect)	Other
Ladue									AQ	S Site Nu	_{mber} 29-189	-3001
Ladue 73 Hunter Ave., L	adue, M	O 63124							AQ	S Site Nu	mber29-189	-3001
73 Hunter Ave., L	adue, M	IO 63124 AQCR:	070	Metro	ppolitan S	it. Louis			AQ.	S Site Nu	mber 29-189	-3001
73 Hunter Ave., L Latitude: 38.6			070 7040		opolitan S ouis, MO-				AQ	S Site Nu	mber 29-189	-3001
73 Hunter Ave., L	5028	AQCR:	7040 <i>AQS</i>	St. Lo	ouis, MO AQS	·IL		AQS Unit- Code	AQS	S Site Nu AQS Method Code	AQS	-3001 AQS Monitor Objective
73 Hunter Ave., L Latitude: 38.6 Longitude: -90.5 Elevation (ft): 511	55028 35021 <i>AQS</i>	AQCR: MSA: AQS Monitor	7040 <i>AQS</i>	St. Lo	ouis, MO AQS	AQS		Unit-	AQS	AQS Method	AQS	AQS Monitor

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Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
PM2.5 - LC FRM/FEM	88101	SLAMS	2	•	1/6	NBR	СОМ	105	ug/m^3-L(C 145	R&P 2025 Sequential w/VSCC	Quality Assurance (Collocation)
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	COM	105	ug/m^3-LC	C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
PM2.5 Volatile Channel	88503	SLAMS	4		1	NBR	СОМ	105	ug/m^3-L(C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	, 020	Instrumental- Computed	Other
											(Indirect)	
Liberty									AQS	S Site Nu		'-0005
Liberty Highway 33 & Co	ounty Ho	ome Rd., L	iberty	, MO	64068				AQS	S Site Nu	(Indirect)	-0005
Highway 33 & Co	ounty Ho	ome Rd., L	iberty,			Kansas Ci	ty		AQS	S Site Nu	(Indirect)	-0005
Highway 33 & Co	-		-	Metro		(ansas Ci	ty		AQS	S Site Nu	(Indirect)	-0005
Highway 33 & Co <i>Latitude:</i> 39.3	0314	AQCR:	094 3760 <i>AQS</i>	Metro Kans	opolitan K $lpha$ as City, N $lpha$	(ansas Ci MO-KS	State-	AQS Unit- Code		S Site Num AQS Method Code	(Indirect) mber 29-047	AQS Monitor Objective
Highway 33 & Co Latitude: 39.3 Longitude: -94.3 Elevation (ft): 941	37678 AQS	AQCR: MSA: AQS Monitor	094 3760 <i>AQS</i>	Metro Kans	opolitan K $lpha$ as City, N $lpha$	Kansas Ci MO-KS AQS	State-	Unit-	AQS	AQS Method	(Indirect) mber 29-047 AQS	AQS Monitor

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Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
PM10 - LC/FEM/NonFEM	85101	SPM	5		1	NBR	СОМ	105	ug/m^3-LC	790	FDMS- Gravimetric 1405 DF	Population - Exposure
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405 DF	Population - Exposure
PM2.5 Tot Atmospheric	88500	SPM	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405 DF	Population - Exposure
PM2.5 Volatile Channel	88503	SPM	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405 DF	Population - Exposure
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Solar Radiation	63301	SPM	1		1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other

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20057 State Pa	ark Office R	d., Stoutsv	ville, N	AO 65	5283				~~			
Latitude:	39.47510	AQCR:	137	North	nern Miss	ouri						
Longitude:	-91.78899	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	710 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperature	e 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Nitric Oxide	42601	SPM	1		Н	REG	СОМ	008	ppb	074	Chemiluminescer ce	n General/Back ground
Nitrogen Dioxide	42602	SPM	1		Н	REG	СОМ	008	ppb	074	Chemiluminescer	n General/Back ground
Oxides of Nitrogen	42603	SPM	1		н	REG	СОМ	008	ppb	074	Chemiluminescer ce	n General/Back ground
Ozone	44201	SLAMS	1		1	REG	СОМ	007	ppm	047	Ultraviolet Photometric	General/Back ground
Ozono	44004	CLAMO	0	✓	4	DEC	COM	007		0.47	I litroviolet	
Ozone	44201	SLAMS	2	V	1	REG	COM	007	ppm	047	Ultraviolet Photometric	-
PM10 - STP FRM/F	EM 81102	SPM	3		1	REG	SIP	001	ug/m^3	079	R&P SA246B TEOM	General/Back ground

Sulfur Dioxide	42401	SPM	1		Н	REG	SIP	008	ppb	060	Pulsed Fluorescent	General/Back ground
Sulfur Dioxide Max 5-mir Avg	n 42406	SPM	1		1	NBR	СОМ	008	ppb	060	Pulsed Fluorescent	General/Back ground
Wind Direction - Resultar	nt 61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Maryland Hei	ghts								AQ	S Site Nu	mber29-189	-0014
1204434 . 4	3.6											
13044 Marine Ave	e., Mary	land Heigl	hts, M	O 631	46							
	e., Mary 1085	land Heigl AQCR:			46 opolitan S	t. Louis						
Latitude: 38.7	•	_		Metro								
Latitude: 38.7	1085	AQCR: MSA:	070	Metro	politan S							
Latitude: 38.7 Longitude: -90.4	1085	AQCR:	070	Metro	politan S	IL	State- Obj	AQS Unit- Code	~	AQS Method Code	AQS	AQS Monitor Objective
Latitude: 38.7 Longitude: -90.4 Elevation (ft): 607	1085 47606 <i>AQS</i>	AQCR: MSA: AQS Monitor	0707040AQS	Metro	opolitan S $lpha$ ouis, MO $lpha$	IL AQS		Unit-		Method	AQS	Monitor
Latitude: 38.7 Longitude: -90.4 Elevation (ft): 607	1085 47606 <i>AQS</i>	AQCR: MSA: AQS Monitor	0707040AQS	Metro St. Lo	opolitan S $lpha$ ouis, MO $lpha$	AQS Scale		Unit-		Method	AQS	Monitor
Latitude: 38.7 Longitude: -90. Elevation (ft): 607 Parameter	1085 47606 AQS Code	AQCR: MSA: AQS Monitor Type	070 7040 <i>AQS</i> <i>POC</i>	Metro St. Lo	opolitan S ouis, MO- AQS Freq	AQS Scale	Obj	Unit- Code	Unit	Method Code	AQS Method	Monitor Objective

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New Bloom	ıfield								AQS	S Site Nu	mber 29-027	'-0002
2625 Meadow	v Lake View	, New Blo	omfie	ld, Mo	O, 6506	53						
Latitude:	38.70608	AQCR:	137	North	nern Miss	ouri						
Longitude:	-92.09308	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	~	AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperatur	re 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	COM	007	ppm	047	Ultraviolet Photometric	Max Ozone Concentration & Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
Oates									AQS	S Site Nu	mber 29-17 9	-0034
13155 Highw	ay KK, Boss	s, MO 654	40						~			
Latitude:	37.56485	AQCR:	138	SE M	lissouri							
Longitude:	-91.11423	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	1134 <i>AQS</i> <i>Code</i>	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obi	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC F		SLAMS	1		1/6	NBR	СОМ	105	ug/m^3-LC		Inductively Coupled Plasma Mass Spectroscopy	Source

Orchard F	arm								AQ	QS Site Nu	mber29-18	3-1004
2165 Highwa	y V, St. Cha	rles, MO 6	53301									
Latitude:	38.8994	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude:	-90.44917	MSA:	7040	St. L	ouis, MO	-IL						
Elevation (ft): Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperatu	re 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	URB	СОМ	007	ppm	047	Ultraviolet Photometric	Extreme Downwind
Ozone	44201	SLAMS	2	✓	1	URB	COM	007	ppm	047	Ultraviolet Photometric	-
Pacific									AC	DS Site Nu	mber 29-1 8	9-0005
18701 Old Hi	ighway 66, P	acific. MO) 6306	59					710	o oue m	mber 20 10	0 0000
Latitude:	38.49011	AQCR:	070		opolitan S	St. Louis						
Longitude:	-90.70509	MSA:	7040	St. Le	ouis, MO-	-IL						
Elevation (ft):	524 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperatu	re 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure

Ozone 44201 SLAMS 2 🗹 1 NBR COM 007 ppm 047 Ultraviolet Photometric

Richards Ge	baur-So	outh							AQS	S Site Nu	mber29-037	-0003
1802 E. 203rd S	Street, Belt	on, MO, 6	4012									
Latitude:	88.75961	AQCR:	094	Metro	opolitan K	(ansas Ci	ty					
Longitude: -	94.57983	MSA:	3760	Kans	as City, N	MO-KS						
Elevation (ft):	1082 <i>AQS</i>	AQS Monitor	AQS		AQS	405	State-	AQS Unit-	AQS	AQS Method		AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale		Code	Unit	Code		Objective_
Barometric Pressure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Outdoor Temperature	e 62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Ozone	44201	SLAMS	1		1	NBR	COM	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	SLAMS	2	•	1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	-
PM10 - LC/FEM/Non	FEM 85101	SPM	5		1	NBR	COM	105	ug/m^3-L0	790	FDMS- Gravimetric 1405- DF	Population Exposure

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PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-Li	C 182	FMDS- Gravimetric 1405 DF	Population - Exposure
PM2.5 Tot Atmospheric	88500	SPM	1		1	NBR	AQI	105	ug/m^3-Lí	C 790	FDMS- Gravimetric 1405 DF	Population - Exposure
PM2.5 Volatile Channel	88503	SPM	1		1	NBR	AQI	105	ug/m^3-Lí	C 790	FDMS- Gravimetric 1405 DF	Population - Exposure
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidit	y 020	Instrumental- Computed (Indirect)	Other
Wind Direction - Resultant	61104	SPM	1		1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	067	Instrumental: RM Young Model 05103	Other (10m Tower)
Rider Trail. 1-7	0								AO.	S Site Nu	mber 29-18 9	-0016
13080 Hollenberg I	Drive, l	Bridgeton,	MO 6	3044					~			
Latitude: 38.75.	264	AQCR:	070	Metro	politan S	t. Louis						
Longitude: -90.44	1884	MSA:	7040	St. Lo	ouis, MO-	IL						
Elevation (ft): 515		AQS						AQS		AQS		AQS
	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State-	Unit-	_	Method		Monitor
Barometric Pressure	64101	SPM	1		1	N/A	MET	<i>Code</i> 059	mm (Hg)	Code 014	Instrumental- Barometric Sensor	Objective Other

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Indoor Temperature	62107	SPM	1	1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Nitric Oxide	42601	SPM	1	Н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
Nitrogen Dioxide	42602	SLAMS	1	Н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
Outdoor Temperature	62101	SPM	2	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (10m Probe Height)
Outdoor Temperature	62101	SPM	3	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (2m Probe Height)
Outdoor Temperature Diff	62106	SPM	1	1	N/A	MET	116	Temp Diff deg C	041	Instrumental: Elect or Mach Avg Lev 2-Lev1	Other (10m - 2m Probe Height)
Oxides of Nitrogen	42603	SPM	1	Н	MIC	СОМ	008	ppb	074	Chemiluminescer ce	n Source Oriented
Precipitation	65102	SPM	1	1	N/A	MET	021	inches	014	Heated Tipping Bucket	Other
Relative Humidity	62201	SPM	1	1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other

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Solar Radiation	63301	SPM	1		1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Std Dev Hz Wind Direction	61106	SPM	1		1	N/A	MET	014	deg	020	Arithmetic Standard Deviation	Other (10m Tower)
Sulfur Dioxide	42401	SPM	1		Н	MID	SPP	008	ppb	060	Pulsed Fluorescent	Population Exposure
Sulfur Dioxide Max 5-min Avg	42406	SPM	1		1	MID	SPP	008	ppb	060	Pulsed Fluorescent	Population Exposure
Wind Direction - Resultant	61104	SPM	1		1	N/A	MET	014	deg	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1		1	N/A	MET	012	mph	065	Instrumental: RM Young Model 05305	Other (10m Tower)
Rocky Creek									AQ	S Site Nui	mber29-047	-0006
2-114 NW 132 St.,	Kansas	s City, MC	6416	5								
Latitude: 39.33	181	AQCR:	094	Metro	politan K	ansas Ci	ty					
Longitude: -94.58	8069	MSA:	3760	Kans	as City, M	10-KS						
	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS	AQS Monitor Objective
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other

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Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	COM	007	ppm	047	Ultraviolet Photometric	-
Savannah									AO	S Site Nu	mber 29-00	3-0001
11796 Highwa	ay 71, Savar	ınah, MO	64485									
Latitude:	39.9544	AQCR:	137	North	ern Miss	ouri						
Longitude:	-94.849	MSA:	7000	St. Jo	oseph, M	0						
Elevation (ft):	1120 <i>AQS</i>	AQS Monitor	AQS		AQS	AQS		AQS Unit-		AQS Method		AQS Monitor
Parameter	Code	Type	POC	Coll	Freq	Scale	Obj	Code	Unit	Code	Method	Objective
Indoor Temperature	e 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	NBR	СОМ	007	ppm	047	Ultraviolet Photometric	Population Exposure
Ozone	44201	SLAMS	2	✓	1	NBR	COM	007	ppm	047	Ultraviolet Photometric	-
South Broa	dway								AQ	S Site Nu	mber29-51	0-0007
8227 South Br	roadway, St.	Louis, M	O 631	11								
Latitude:	38.5425	AQCR:	070	Metro	politan S	St. Louis						
Longitude:	-90.263611	MSA:	7040	St. Lo	ouis, MO	-IL						
Elevation (ft): Parameter	452 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective

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Barometric Pressure	64101	SLAMS	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-L0	C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
PM2.5 Volatile Channel	88503	SPM	4		1	NBR	AQI	105	ug/m^3-L0	C 181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	, 020	Instrumental- Computed (Indirect)	Other
St. Joe State Po	ark								AQS	S Site Nu	mber29-187	-0007
2800 Pimville Rd.,	Park H	lills, MO 6	3601									
Latitude: 37.81	1413	AQCR:	138	SE Mi	ssouri							
Longitude: -90.5	0738	MSA:	0000	Not in	a MSA							
	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC FRM/FE	M 14129	SPM	1		1/6	NBR	СОМ	105	ug/m^3-L0	C 813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented

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St. Joseph Pu	imp Sta	tion							AQ	S Site Nu	mber 29- 021	-0005
S. Highway 759,	, St. Josep	h, MO 64	501									
Latitude: 39	9.741667	AQCR:	094	Metr	opolitan K	(ansas Ci	ty					
Longitude: -9	4.858333	MSA:	7000	St. J	oseph, M	0						
Elevation (ft): 84 Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code	AQS Unit	AQS Method Code	AQS	AQS Monitor Objective
Barometric Pressure	64101	SPM	1		1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Barometric Pressure	64101	SPM	2	✓	1	N/A	MET	059	mm (Hg)	014	Instrumental- Barometric Sensor	Other
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Outdoor Temperature	62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Outdoor Temperature	62101	SPM	2	✓	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
PM10 - LC/FEM/NonF	EM 85101	SPM	5		1	NBR	СОМ	105	ug/m^3-Li	C 790	FDMS- Gravimetric 1405 DF	Population - Exposure
PM10 - LC/FEM/NonF	EM 85101	SPM	6	✓	1	NBR	СОМ	105	ug/m^3-L	C 790	FDMS- Gravimetric 1405 DF	Quality - Assurance (Collocation)

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PM10 - STP FRM/FEM	81102	SLAMS	3		1	NBR	СОМ	001	ug/m^3	079	R&P SA246B TEOM	Population Exposure
PM2.5 - LC FRM/FEM	88101	SLAMS	4		1	NBR	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405- DF	Population - Exposure
PM2.5 - LC FRM/FEM	88101	SLAMS	5	✓	1	NBR	СОМ	105	ug/m^3-LC	182	FMDS- Gravimetric 1405- DF	Quality - Assurance (Collocation)
PM2.5 Tot Atmospheric	88500	SPM	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Population - Exposure
PM2.5 Tot Atmospheric	88500	SPM	2	✓	1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Quality - Assurance (Collocation)
PM2.5 Volatile Channel	88503	SPM	1		1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Population Exposure
PM2.5 Volatile Channel	88503	SPM	2	•	1	NBR	AQI	105	ug/m^3-LC	790	FDMS- Gravimetric 1405- DF	Quality - Assurance (Collocation)
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Relative Humidity	62201	SPM	2	✓	1	N/A	MET	019	%humidity	020	Instrumental- Computed (Indirect)	Other
Wind Direction - Resultan	t 61104	SPM	1		1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (5.5 meters)

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Young Model meters) 05103 AQS Site Number 29-049-0001 Trimble. 7536 SW. O Highway, Trimble, MO 64492 Northern Missouri 137 Latitude: AQCR: 39.53063 Longitude: MSA: 3760 Kansas City, MO-KS -94.55594 1033 **Elevation** (ft): **AQS AOS** AOS AOS **Monitor** Unit-Monitor AOS **AOS** AQS AQS State-AQSMethod AQS **Type Parameter** Code POC Coll Freq Scale Obj Code Unit Method Code **Objective** 62107 SPM N/A 013 Other Indoor Temperature 1 1 MET 017 Electronic deg C Averaging SLAMS 44201 NBR COM 007 047 Ozone ppm Ultraviolet Max Ozone Photometric Concentration ✓ Ozone 44201 **SLAMS** 2 NBR COM 007 047 Ultraviolet ppm Photometric AQS Site Number 29-095-0034 roost 724 Troost (Rear), Kansas City, MO 64106 094 Metropolitan Kansas City Latitude: AQCR: 39.10463 3760 Kansas City, MO-KS Longitude: MSA: -94.57040 Elevation (ft): **AQS** AQS AQS AQS **Monitor** AQS **AOS** AOS AQS State-Unit-AQS Method AQS Monitor **Parameter** Code **Type** POC Coll Freq Scale Obj Unit Method Code Code **Objective** Barometric Pressure 64101 SPM N/A 059 mm (Hg) 014 Instrumental-Other Barometric Sensor

N/A

MET

012

mph

067

Instrumental: RM Other (5.5

SPM

1

61103

Wind Speed - Resultant

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Indoor Temperature	62107	SPM	1	1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Nitric Oxide	42601	SPM	1	Н	URB	СОМ	008	ppb	074	Chemiluminescen ce	Population Exposure
Nitrogen Dioxide	42602	SLAMS	1	Н	URB	СОМ	008	ppb	074	Chemiluminescen ce	Population Exposure
Outdoor Temperature	62101	SPM	1	1	N/A	MET	017	deg C	040	Electronic Averaging	Other (4m Probe Height)
Oxides of Nitrogen	42603	SPM	1	Н	URB	СОМ	008	ppb	074	Chemiluminescen ce	Population Exposure
PM10 - STP FRM/FEM	81102	SPM	6	Н	NBR	СОМ	001	ug/m^3	239	Teledyne API T640x	Population Exposure
PM2.5 - LC FRM/FEM	88101	SLAMS	4	Н	NBR	СОМ	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure
PM2.5 - LC FRM/FEM	88101	SPM	6	Н	NBR	СОМ	105	ug/m^3-LC	238	Teledyne API T640x	Population Exposure
PM2.5 Volatile Channel	88503	SPM	4	1	NBR	AQI	105	ug/m^3-LC	181	PM2.5 VSCC FEM or Thermo Scientific 1405-F	Population Exposure

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Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	y 020	Instrumental- Computed (Indirect)	Other
Sulfur Dioxide	42401	SLAMS	1		Н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max 5-min Avg	42406	SLAMS	1		1	MID	COM	008	ppb	060	Pulsed Fluorescent	Source Oriented
Ursuline North	<u>, </u>								AQ	S Site Nu	mber 29-09 9	-0025
210 Glennon Heigl	hts Rd.	, Crystal C	ity, M	O 630)19							
Latitude: 38.24		AQCR:	070		opolitan S	St. Louis						
Longitude: -90.3	7372	MSA:	7040	St. Lo	ouis, MO-	-IL						
Elevation (ft): 578		AQS						4.00		4.00		4.00
	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale		AQS Unit- Code	_	AQS Method Code	AQS Method	AQS Monitor Objective
Lead (TSP) - LC FRM/FE	M 14129	SLAMS	1		1/6	NBR	СОМ	105	ug/m^3-L(C 813	Inductively Coupled Plasma Mass Spectroscopy	Source Oriented & Upwind Background
Watkins Mill S	tato I	ark							40	S Sito Nu	mber29-047	-0003
Watkins Mill Road			1062						AQ	Jue Iva	mber EU U-FI	0000
Latitude: 39.40		on, wo on AQCR:	094	Metro	opolitan k	(ansas Ci	ty					
Longitude: -94.2		MSA:	3760	Kans	as City, N	MO-KS						
Elevation (ft): 1009		AQS						AQS		AQS		AQS
	AQS Code	Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj		AQS Unit	Method Code	AQS Method	Monitor Objective
Indoor Temperature	62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other

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Ozone	44201	SLAMS	1		1	URB	СОМ	007	ppm	047	Ultraviolet Photometric	Extreme Downwind
Ozone	44201	SLAMS	2	✓	1	URB	COM	007	ppm	047	Ultraviolet Photometric	-
West Alton AQS Site Number 29-183-1002												
General Elecric Store, Highway 94, West Alton, MO 63386												
Latitude:	38.8725	AQCR:	070	Metro	opolitan S	St. Louis						
Longitude:	-90.226389	MSA:	7040	St. Lo	ouis, MO-	·IL						
Elevation (ft): Parameter	425 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code		AQS Method Code	AQS Method	AQS Monitor Objective
Indoor Temperatui	re 62107	SPM	1		1	N/A	MET	017	deg C	013	Electronic Averaging	Other
Outdoor Temperat	rure 62101	SPM	1		1	N/A	MET	017	deg C	040	Electronic Averaging	Other
Ozone	44201	SLAMS	1		1	URB	СОМ	007	ppm	047	Ultraviolet Photometric	Max Ozone Concentration & Population Exposure
Ozone	44201	SLAMS	2	✓	1	URB	СОМ	007	ppm	047	Ultraviolet Photometric	-
Relative Humidity	62201	SPM	1		1	N/A	MET	019	%humidity	y 020	Instrumental- Computed (Indirect)	Other

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Solar Radiation	63301	SPM	1	1	N/A	MET	079	W/m^2	011	Instrumental- Pyranometer	Other
Wind Direction - Resultant	61104	SPM	1	1	N/A	MET	014	deg	067	Instrumental: RM Young Model 05103	Other (10m Tower)
Wind Speed - Resultant	61103	SPM	1	1	N/A	MET	012	mph	067	Instrumental: RM Young Model 05103	Other (10m Tower)

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Magnitude 7 Metals (PQAO - 2368)

Magnitude	7 Metals.	Site # .	l AE	CI V	Vater	Tow	er Lo	catio.	n A	AQS Site Nu	mber29-14	13-9001
391 St Jude Industrial Park, New Madrid, MO 63869												
Latitude:	36.51364	AQCR:	138	SE N	/lissouri							
Longitude:	-89.56093	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	297 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State- Obj	AQS Unit- Code			AQS Method	AQS Monitor Objective
Indoor Temperatur	re 62107	Industrial	1		1	MID	MET	017	deg C	013	Electronic Averaging	Other
Sulfur Dioxide	42401	Industrial	1		Н	MID	COM	800	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max Avg	c 5-min 42406	Industrial	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Magnitude	7 Metals.	Site # 2	2 <i>Ea.</i>	st Gi	ravev	ard			A	AQS Site Nu	mber29-14	13-9002
391 St Jude In	ndustrial Parl	k, New Ma	adrid,	MO 6	3869							
Latitude:	36.50838	AQCR:	138	SE N	/lissouri							
Longitude:	-89.56074	MSA:	0000	Not i	n a MSA							
Elevation (ft): Parameter	296 AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq		State- Obj	AQS Unit- Code			AQS Method	AQS Monitor Objective
Indoor Temperatur	re 62107	Industrial	1		1	MID	MET	017	deg C	013	Electronic Averaging	Other

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Sulfur Dioxide	42401	Industrial	1		Н	MID	СОМ	800	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max 5-mir Avg	n 42406	Industrial	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Magnitude 7 Metals. Site # 3 West Entrance AQS Site Number												-9003
391 St Jude Indus	trial Park	k, New Ma	drid, l									
Latitude: 36.5	0899	AQCR:	138	SE M	issouri							
Longitude: -89.	57099	MSA:	0000	Not in	a MSA							
Elevation (ft): 298 Parameter	AQS Code	AQS Monitor Type	AQS POC	Coll	AQS Freq	AQS Scale	State-	AQS Unit- Code	AQS Unit	AQS Method Code		AQS Monitor Objective
1 arameter	Couc	JI -	100	Con	Treq	Deute	OUJ	Coue	Onu	Code	Memou	Objective
Indoor Temperature	62107	Industrial	1		1	MID	MET	017	deg C	013	Electronic Averaging	Other
Sulfur Dioxide	42401	Industrial	1		Н	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Sulfur Dioxide Max 5-mir Avg	า 42406	Industrial	1		1	MID	СОМ	008	ppb	060	Pulsed Fluorescent	Source Oriented
Wind Direction - Resulta	nt 61104	Industrial	1		1	MID	MET	014	deg	065	Instrumental: RM Young Model 05305	Other
Wind Speed - Resultant	61103	Industrial	1		1	MID	MET	011	m/s	065	Instrumental: RM Young Model 05305	Other

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Appendix 2: Comments on Proposed 2020 Monitoring Network Plan, Responses to Comments, and Corrections

The comment reproduced on the following pages was received from the Interdisciplinary Environmental Clinic, Washington University School of Law, submitted on behalf of the Sierra Club. The Department's response and identification of minor corrections to the plan (unrelated to the comment) follow the comment.



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Interdisciplinary Environmental Clinic

August 14, 2020

Missouri Department of Natural Resources Air Pollution Control Program Air Quality Analysis Section/Air Monitoring Unit P.O. Box 176 Jefferson City, MO 65102

Via email to: cleanair@dnr.mo.gov

Re: 2020 Monitoring Network Plan

To whom it may concern:

Submitted on behalf of Sierra Club, these comments urge the Missouri Department of Natural Resources ("DNR") to revise its 2020 Monitoring Network Plan to include a new sulfur dioxide ("SO₂") ambient air monitoring site southeast of the Labadie Energy Center in Franklin County. The purpose of the SO₂ monitoring network around Labadie is to provide sufficient information to determine whether the area, which the U.S. Environmental Protection Agency ("EPA") designated as unclassifiable for the 2010 1-hour SO₂ National Ambient Air Quality Standard ("NAAQS") in 2016,¹ is attaining that standard. As explained below, the current network is insufficient for this task.

As explained in greater detail in Sierra Club's recent comments on DNR's proposed request to redesignate the Labadie unclassifiable area to attainment under the 2010 SO₂ NAAQS, which are attached as Exhibit 1 and hereby incorporated by reference, the current SO₂ monitoring network around Labadie leaves a significant data gap that must be filled before the area's attainment status can be determined. Modeling performed by Ameren in 2016 using the limited on-site meteorological data available at the time indicated that peak 1-hour SO₂ concentrations were expected to occur southeast of the plant. Per EPA, on-site meteorological data are "the most valuable data for [monitoring site evaluations]" and "provide the best information to understand the actual conditions in which SO₂ emissions are being dispersed." Hence, Ameren's 2016 modeling provided the best estimate of peak SO₂ concentration areas around the Labadie plant available at that time. Ameren's own evaluation of its 2016 modeling identified the area southeast of the plant as a "preferred monitoring location," along with an area to the southwest.³

¹ EPA, Air Quality Designations for the 2010 Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard—Round 2, 81 Fed. Reg. 45039 (July 12, 2016).

² EPA, SO₂ NAAQS Designations Source-Oriented Monitoring Technical Assistance Document (Feb. 2016, Draft) at 6.

³ DNR, 2016 Monitoring Network Plan, Revision 1 (Nov. 15, 2016) at 176. ("As can be seen from the figures, only locations to the southwest and southeast of the Labadie Energy Center remain as preferred SO₂ monitoring locations.")

Missouri Department of Natural Resources August 14, 2020 Page 2 of 2

However, DNR only required Ameren to install a monitor southwest of the plant when it expanded the Labadie monitoring network in late 2016.

Since that time, Ameren has collected a great deal more on-site meteorological data. The data from the meteorological monitoring station at the Northwest monitoring site, which are most representative of winds at stack height and therefore best approximate the direction of plume transport, show that winds were most frequently from the northwest during the 2017-2019 period. This indicates that the Labadie plume was transported to the southeast more frequently than in any other direction over the past three years. This validates the results of Ameren's 2016 modeling and reaffirms the need for a monitor southeast of the plant. Without a monitor in this critical location, DNR lacks data from what is most likely the point of maximum SO₂ impacts around the Labadie plant. So long as this data gap remains, DNR will not have sufficient information to determine whether the Labadie area is attaining the 2010 SO₂ NAAQS, regardless of what the existing monitors show.

Sincerely yours,

Elizabeth Hubertz, Director

Kenneth Miller, P.G., Environmental Scientist

Interdisciplinary Environmental Clinic

Washington University School of Law

One Brookings Drive – CB 1120

St. Louis, MO 63130

314-935-8760

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Attorneys for the Sierra Club

Cc: Dana Skelley, Director, Air & Radiation Division, EPA Region 7
 Michael Jay, Chief, Air Planning & Development Branch, EPA Region 7
 Darcy Bybee, Director, Air Pollution Control Program, DNR
 Emily Wilbur, Chief, Air Quality Planning Section, DNR

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Interdisciplinary Environmental Clinic

August 6, 2020

Ms. Emily Wilbur Chief, Air Quality Planning Section Air Pollution Control Program Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

Via email to: apcpsip@dnr.mo.gov

Re: Redesignation Request for the Labadie Unclassifiable Area

Dear Ms. Wilbur:

On behalf of the Sierra Club, we submit the following comments on the Missouri Department of Natural Resources' ("DNR") request to reclassify the area around the Ameren Labadie Energy Center from unclassifiable to attainment for the 2010 1-hour sulfur dioxide ("SO₂") National Ambient Air Quality Standard ("NAAQS"). The U.S. Environmental Protection Agency ("EPA") designated the area, which includes portions of Franklin County and St. Charles County, Missouri, as unclassifiable in July 2016 pursuant to a court-ordered schedule requiring it to complete certain designations for the 2010 SO₂ NAAQS by July 2, 2016.²

We believe DNR's request to reclassify the Labadie area to attainment is premature. There is no ambient SO_2 monitor southeast of the plant, where modeling performed by Ameren in 2016 using the limited on-site meteorological data available at the time indicated peak 1-hour SO_2 concentrations were expected to occur. Additional on-site meteorological data collected in the ensuing three years shows that winds near the Labadie stack height are predominantly from the northwest, validating Ameren's 2016 modeling and reinforcing the need for a monitor southeast of the plant. No decisions regarding the attainment status of the area should be made until this significant data gap is filled.

The Data Gap Southeast Of The Labadie Plant Must Be Filled Before The Labadie Area's Attainment Status Can Be Determined

¹ DNR, Redesignation Request for the Labadie Unclassifiable Area Under the 2010 Sulfur Dioxide Standard (July 30, 2020) ("Labadie Redesignation Request").

² Areas subject to the July 2, 2016 deadline included "(1) Areas that have newly monitored violations of the 2010 SO₂ NAAQS and (2) areas that contain any stationary sources that had not been announced as of March 2, 2015, for retirement and that, according to the EPA's Air Markets Database, emitted in 2012 either (i) more than 16,000 tons of SO₂, or (ii) more than 2,600 tons of SO₂ with an annual average emission rate of at least 0.45 pounds of SO₂ per one million British thermal units (lbs SO₂/mmBTU)." EPA, Air Quality Designations for the 2010 Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard—Round 2, 81 Fed. Reg. 45039 (July 12, 2016) at 45042.

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As explained in Sierra Club's comments on DNR's revised 2016 Monitoring Network Plan,³ the modeling evaluation Ameren performed in 2016 using the available on-site meteorological data from the Valley monitoring site ("2016 modeling evaluation") strongly supported the need for an SO₂ monitor southeast of Labadie. According to EPA's SO₂ NAAQS Designations Source-Oriented Monitoring Technical Assistance Document ("Monitoring TAD"), "the most valuable data for [monitoring site evaluations] are meteorological data collected very nearby or even on the property of an identified SO₂ emitting facility ... These on-site data typically have very good spatial representativeness of the area in which the identified SO₂ source is situated, and thus, provide the best information to understand the actual conditions in which SO₂ emissions are being dispersed." Therefore, Ameren's 2016 modeling evaluation was more representative of conditions around Labadie than previous evaluations by both DNR and Ameren, which used airport data from the National Weather Service ("NWS") instead of on-site data.

The results of the 2016 modeling evaluation are shown in Figures 1-4 below. These figures show normalized design values ("NDVs") for all receptors exceeding 75 percent of the maximum NDV and score ranks for the top 200 receptors for all meteorological and emissions datasets used in the modeling. Score ranks, which provide a means of prioritizing receptor locations for consideration as permanent monitoring sites using NDVs and frequency of having the highest 1-hour daily maximum concentration, were calculated using the methodology described in Appendix A of the Monitoring TAD. Note that the "suggested monitor" in these figures (denoted by a pink triangle labeled Southeast) is not a current monitoring site location, but rather the location where Sierra Club recommended a monitor be installed based on the results of the 2016 modeling evaluation. Only the "current/planned monitors" in the figures (denoted by black triangles labeled North, Northwest, Southwest, and Valley) represent current monitoring site locations.

³ DNR, 2016 Monitoring Network Plan, Revision 1 (Nov. 15, 2016) ("Revised Plan").

⁴ EPA, SO₂ NAAQS Designations Source-Oriented Monitoring Technical Assistance Document (Feb. 2016, Draft) ("Monitoring TAD") at 6, available at https://www.epa.gov/sites/production/files/2016-06/documents/so2monitoringtad.pdf.

⁵ Because the Valley monitoring site was flooded from the end of December 2015 until late March 2016 resulting in a gap in the on-site meteorological data, Ameren used four separate meteorological datasets in its modeling: 1) Valley site data from April 22, 2015 through June 30, 2016; 2) Valley site data from April 22, 2015 through June 30, 2016 with the gap filled with NWS data from Jefferson City Memorial Airport; 3) Valley site data from April 22, 2015 through June 30, 2016 with the gap filled with NWS data from Spirit of St. Louis Airport; and 4) Weather Research and Forecasting model data for the year 2015. Ameren also used three separate emissions datasets: 1) actual hourly emissions (normalized) with actual hourly stack temperatures and exit velocities; 2) a fixed emission rate with constant stack temperature and exit velocity based on all units operating at >500 MW ("high-load scenario"); and 3) a fixed emission rate with constant stack temperature and exit velocity based on all units operating between 300-450 MW ("mid-load scenario").

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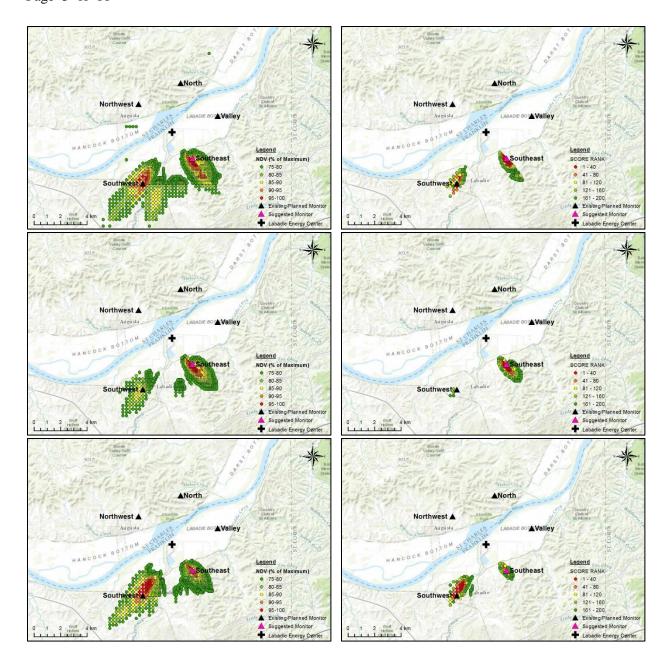


Figure 1: Normalized design values (left; all receptors exceeding 75% of the maximum NDV) and score ranks (right; top 200 receptors only) for modeling runs using meteorological data from the Valley site. The top, middle, and bottom rows show results for the actual hourly emissions scenario, the high-load scenario, and the mid-load scenario, respectively.

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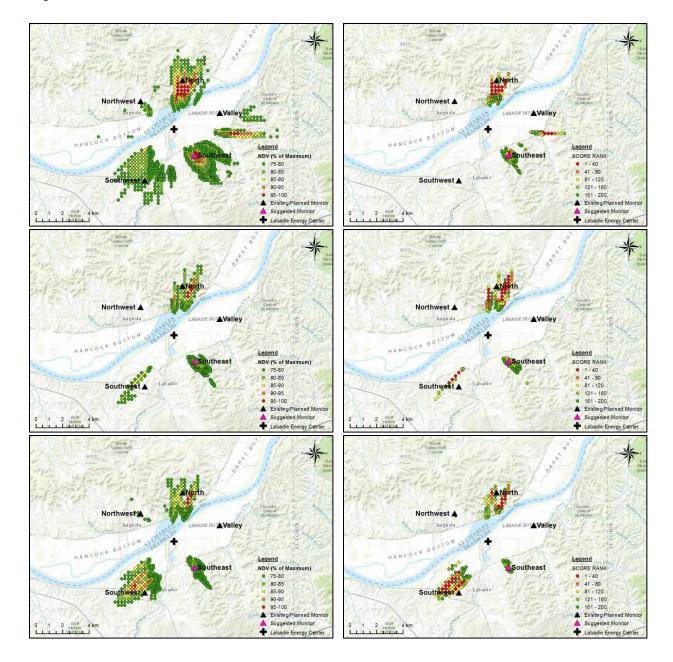


Figure 2: Normalized design values (left; all receptors exceeding 75% of the maximum NDV) and score ranks (right; top 200 receptors only) for modeling runs using meteorological data from the Valley site with the gap in on-site data filled with NWS data from Jefferson City Memorial Airport. The top, middle, and bottom rows show results for the actual hourly emissions scenario, the high-load scenario, and the mid-load scenario, respectively.

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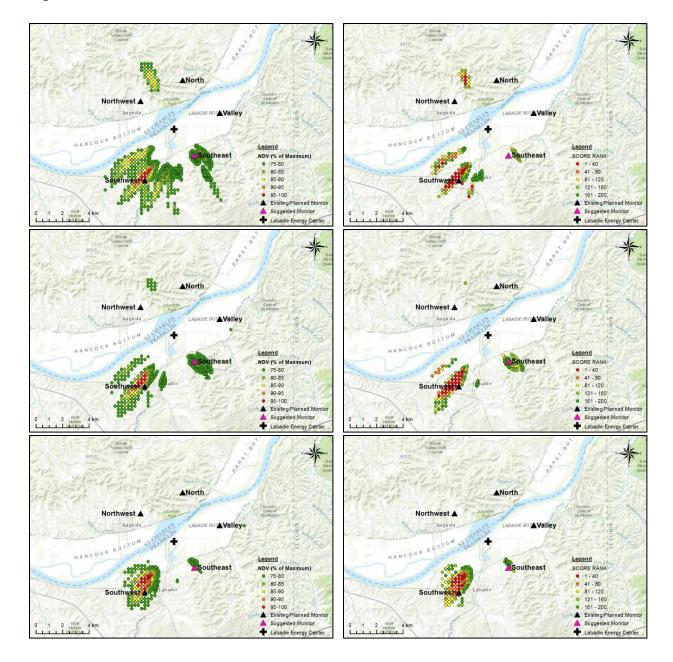


Figure 3: Normalized design values (left; all receptors exceeding 75% of the maximum NDV) and score ranks (right; top 200 receptors only) for modeling runs using meteorological data from the Valley site with the gap in on-site data filled with NWS data from Spirit of St. Louis Airport. The top, middle, and bottom rows show results for the actual hourly emissions scenario, the high-load scenario, and the mid-load scenario, respectively.

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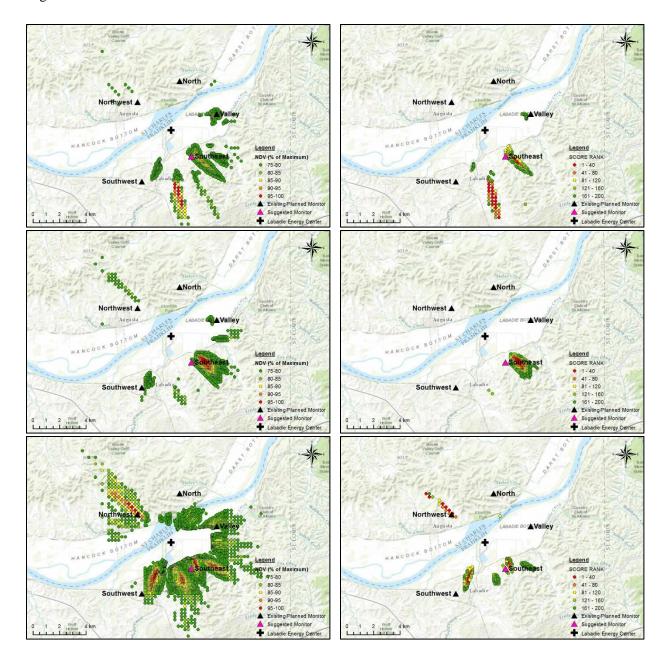


Figure 4: Normalized design values (left; all receptors exceeding 75% of the maximum NDV) and score ranks (right; top 200 receptors only) for modeling runs using Weather Research and Forecasting model meteorological data. The top, middle, and bottom rows show results for the actual hourly emissions scenario, the high-load scenario, and the mid-load scenario, respectively.

As Figures 1-4 clearly show, all of Ameren's 2016 modeling predicted an area of high NDVs and/or highly ranked receptors southeast of Labadie. The size and exact locus of the area, modeled NDVs, and receptor ranks all varied somewhat depending on the meteorological and emissions datasets used. However, in every instance there was a grouping of top 200 receptors in the area that frequently included some of the most highly ranked receptors. Further, modeled

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NDVs in the area were always greater than 75 percent of the maximum NDV and were greater than 90 or 95 percent of the maximum in over half of the model runs. Hence the modeling strongly supported a monitor southeast of the plant.

Ameren's own analysis of its 2016 modeling reached the same conclusion. Appendix 5 of DNR's revised 2016 Monitoring Network Plan included an analysis by Ameren that purported to combine the results of all modeling runs using the four different meteorological datasets (for the actual hourly and high-load emissions scenarios) in order to determine a preferred monitor location.⁶ The results of this analysis are shown in Figures 5 and 6 below.⁷

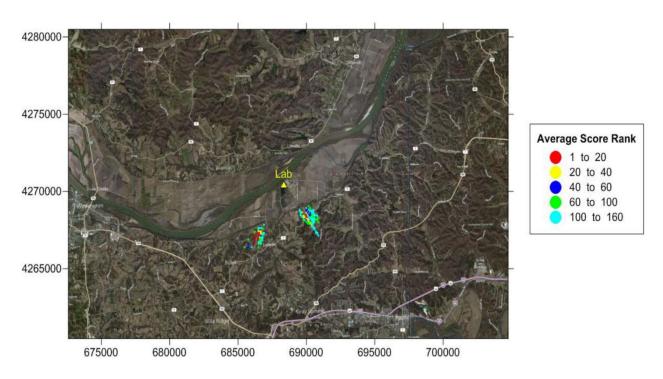


Figure 5. Summary average score rank over all met scenarios, actual hourly emissions scenario.

⁶ Revised Plan at 172. ("To further refine a preferred monitor location from the scenario predictions, the top 200 NDV receptors for these two operating conditions were combined into individual files of 800 receptors (top 200 NDV receptors for each meteorological scenario). These receptors were then searched to see if any of the top 200 NDV receptors for each meteorological scenario were repeated. A list of receptors that occurred in at least two or more of the meteorological scenarios were compiled and the average score rank for those duplicate receptors was calculated. Those duplicate receptors were then ranked. This ranked list of receptors represents a consensus between the four different meteorological scenarios as to the best location to site an additional SO₂ monitor.")

⁷ Figures 5 and 6 reproduce Figures 6 and 7, respectively, from Revised Plan, Appendix 5.

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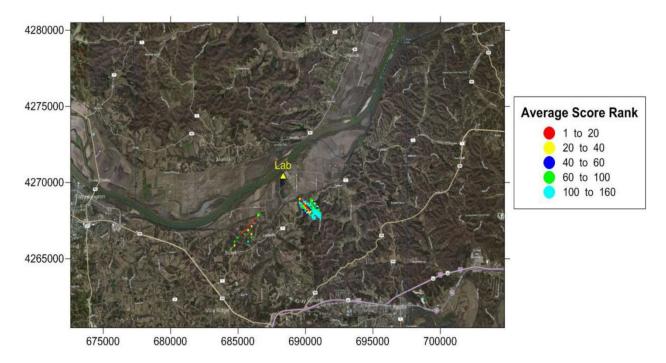


Figure 6. Summary average score rank over all met scenarios, high-load emissions scenario.

Figures 5 and 6 both show groupings of duplicate receptors with high average score ranks southeast and southwest of Labadie. Ameren provided this analysis to justify the new Southwest monitor it was proposing at the time. However, it also clearly demonstrated the need for a monitor southeast of the plant, an area Ameren itself labeled a "preferred monitoring location" like the area to the southwest.⁸ In fact, it arguably showed a greater need for a monitor to the southeast than to the southwest due the preponderance of highly ranked receptors in that area. This led Sierra Club to conclude at the time, "The addition of a southeast monitor is critical to monitoring all significant areas around Labadie where peak 1-hour SO₂ concentrations are expected to occur."

Unfortunately, EPA approved DNR's revised 2016 Monitoring Network Plan without requiring Ameren to install a monitor southeast of Labadie. Now, more than three years later, on-site meteorological data collected in the ensuing years shows that this was a mistake and reaffirms the need for a monitor at this location to determine compliance with the 2010 SO₂ NAAQS. Since late February 2017, Ameren has operated a meteorological monitoring station at the Northwest monitor. The wind rose for this monitor for the period February 23, 2017 through December 31, 2019 is shown in Figure 7 below.

⁸ Revised Plan at 176. ("As can be seen from the figures, only locations to the southwest and southeast of the Labadie Energy Center remain as preferred SO₂ monitoring locations.")

⁹ Sierra Club comments on Revised Plan (Dec.14, 2016).

¹⁰ Ameren has also continued to operate the meteorological monitoring station at the Valley monitor. However, the Valley monitor is located in the Missouri River Valley, where channeling is an issue. The Northwest monitor, by contrast, is located in elevated terrain to the north of the Missouri River Valley, where topographic wind effects like

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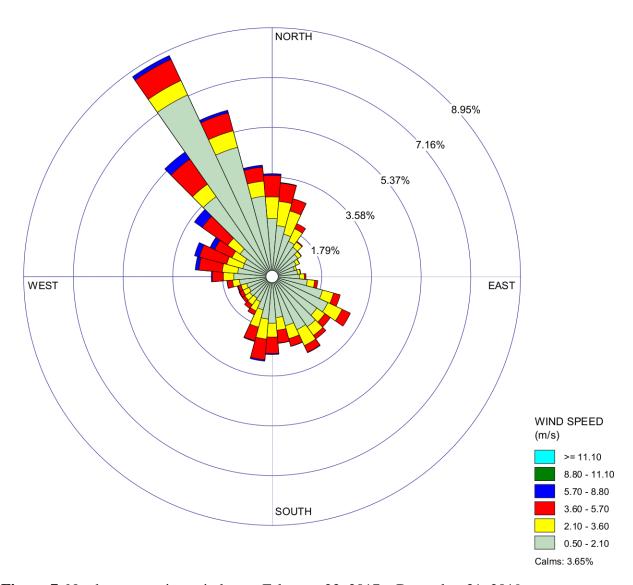


Figure 7. Northwest monitor wind rose, February 23, 2017 – December 31, 2019.

Figure 7 shows that the most frequent winds at the Northwest monitor during the 2017-2019 period were from the northwest. This was the case by a wide margin; winds were from the northwest roughly 20 percent of the time, or one out of every five days, which is several times the frequency of winds from any other direction. Given that wind direction approximates the direction of plume transport, this indicates that the Labadie plume was transported to the southeast much more frequently than in any other direction during the 2017-2019 period. Hence it is possible if not probable that the highest SO₂ concentrations during this period occurred southeast of Labadie, not to the north, northwest, southwest, or east, where the Labadie SO₂

channeling are less likely. It is also closer to Labadie's stack-tip elevation. As such, winds at the Northwest monitor are more representative of winds at stack height and better approximate the direction of plume transport.

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monitors are located. As a result, SO₂ concentrations near Labadie may have exceeded the NAAQS in 2017-2019 even though the monitors all showed compliance with the standard during that time.

Conclusion

Areas are designated as unclassifiable when there is insufficient information available to determine whether or not they are attaining the NAAQS. While the addition of two new SO₂ monitors north and southwest of Labadie in 2016 was a positive step toward obtaining sufficient information to determine whether the area is attaining the 2010 SO₂ NAAOS, DNR and EPA's failure to also require the installation of a monitor southeast of the plant, where Ameren's 2016 modeling evaluation indicated peak 1-hour SO₂ concentrations were expected to occur and where on-site meteorological data collected in the ensuing years shows the Labadie plume is most frequently transported, has resulted in a significant data gap that must be filled before the area's attainment status can be determined. The fact that all existing monitors purport to show compliance with the standard¹¹ does not demonstrate that the entire area is attaining the standard if, as the available information strongly suggests, DNR has no data for the area with the highest concentrations. DNR's assertion that the basis for the unclassifiable area designation no longer exists now that all the monitors have valid design values is therefore untrue. 12 To the contrary. because DNR – due to the data gap southeast of the plant – lacks sufficient information to determine whether the entire area is attaining the NAAQS, unclassifiable remains the only justifiable designation for the area.

DNR's 2020 Monitoring Network Plan is currently on public notice. We recommend the department shelve its redesignation request and modify the 2020 Monitoring Network Plan to include a new SO₂ monitor southeast of Labadie in order to fill the data gap in that area. Only when the new southeast monitor has a valid design value based on three years of quality-assured monitoring data will DNR have sufficient information to determine whether the Labadie area is attaining the 2010 SO₂ NAAQS. Although EPA indicated in its January 2017 response to Sierra Club's petition for reconsideration of the Labadie unclassifiable designation that it anticipated completing a new evaluation and potentially redesignating the area by December 31, 2020, it is under no deadline to act by that date. Hence, there is no reason to rush to judgement and seek redesignation to attainment before the data gap southeast of the plant is filled. Alternatively, if DNR and EPA insist on moving forward despite this critical data gap, then the agencies could utilize modeling to complete the designation now that three full years of on-site meteorological data are available. Labadie is still the largest source of SO₂ in Missouri and the largest coal-fired power plant in the country without SO₂ controls. As such, it is critically important that DNR

¹¹ All four monitors do not, in fact, show compliance with the standard. There is no valid 2017-2019 design value for the Valley monitor because the 2019 data for the Valley monitor, which was offline due to flooding from May 13 to August 2, 2019, is incomplete. This is yet another reason why DNR should not move forward with its redesignation request at this time.

¹² Labadie Redesignation Request at 1.

¹³ DNR, 2020 Monitoring Network Plan (July 15, 2020), available at https://dnr.mo.gov/env/apcp/docs/2020-07-14-2020-monitoring-network-plan-with-appendix.pdf.

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protect the public and not seek to redesignate the Labadie area until it has sufficient information to determine whether the area is, in fact, attaining the NAAQS.

Sincerely yours,

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 Darcy Bybee, Director, Air Pollution Control Program, DNR

The comment letter and exhibit reproduced on the preceding pages state that an additional SO₂ monitoring site southeast of the Labadie Energy Center should be established, and that designation recommendations for the area around the Labadie facility should be delayed until three years of data be recorded at that proposed site.

The first two monitoring sites near the Labadie Energy Center, the Valley and Northwest sites, were sited based on the best available information at the time in 2015. These sites were later found to be insufficient when the SO₂ Data Requirements Rule (DRR) was published and new onsite meteorological data became available. In order to bolster the monitoring network Ameren commissioned an independent analysis to identify the areas of maximum concentration. This analysis had the benefit of onsite meteorology data from the meteorological station installed with the first monitors. The analysis recommended retaining the two existing sites and proposed two additional sites, the North and Southwest sites, which were installed and became operational by January 1, 2017. A Southeast site was proposed in the analysis as an alternate if one of the other two sites was infeasible; this Southeast site was not ultimately chosen, as it would capture similar concentrations as the existing Valley and Northwest sites. The current network of four sites in the Labadie area was proposed in the 2016 Monitoring Network Plan, which was approved by EPA.

As reported in the Department's request for redesignation of the Labadie area to attainment for the 2010 SO₂ NAAQS, the SO₂ design values at these four sites are all well below the level of the standard. Therefore, a southeast site, which would be at an elevation and distance from the facility similar to the North and Northwest sites, would have also shown design values below the level of the standard resulting from times when wind was from the northwest.

The Sierra Club petitioned EPA in 2016 to reconsider the unclassifiable designation of the Labadie area. In response, EPA committed to reconsider the designation once three years of quality-assured data had been collected. EPA is moving forward with this commitment, and a letter stating their intent to move forward with redesignation was sent to the Governor dated August 6, 2020. This started a 120-day timetable for EPA's decision. The Department is moving forward with a redesignation request in parallel with EPA's efforts to redesignate the area.

No additional SO₂ monitors are required to determine compliance with the NAAQS since EPA has already approved the monitors that will be used to meet the monitoring characterization requirements of the DRR, 40 CFR 51.1203(c) and the ambient air monitoring network meets the minimum monitoring requirements of 40 CFR 58.

In summary, data from a southeast site would capture similar concentrations to those from existing monitors, and therefore would not change the designation recommendation. Therefore, no changes were made to the plan because of this comment.

The following minor corrections (unrelated to the comment) were made to this final version of the plan:

- The section entitled "How to Make Public Comments Concerning this Plan" has been revised to indicate that the plan was posted for public review for 30 days, and that comments received are presented and addressed in this final version of the plan,
- The legend for the state's monitoring network (page 8) was corrected to include the SO₂ monitor at the Mott Street site in Herculaneum,
- In Appendix 1, the height of the meteorological tower at the Buick Northeast site was corrected from 6 meters to 10 meters, and the latitude and longitude coordinates of a few sites were changed slightly to be more accurate.